

## **Midterm Evaluation of the Bulgaria GEF Biodiversity Project**

---

*Prepared by:*

Roy Hagen  
Curt Meine  
Petar Iankov

*Prepared for:*

**The Bulgarian Global Environmental Facility Biodiversity Project**

*A collaborative initiative between:*

**The United States Agency for International Development  
and  
The Government of the Republic of Bulgaria**

*Implemented by:*

**Associates in Rural Development, Inc.**  
Project No. DHR-0039-C-00-5070-00

**September 1997**

# Evaluation Overview

---

In the spirit of a formative and participatory evaluation, ARD, Inc., provides the following response to the content and recommendations of the Mid-Term Evaluation of the Bulgaria GEF Biodiversity Project.

These comments detail where ARD has a somewhat different view, or where we feel emphasis could have been adjusted to give a more complete view of events, accomplishments, or problems. Because of the limited institutional memory and experience with the design and implementation of environment and natural resources projects within Central and Eastern Europe (CEE) and the Newly Independent States (NIS), ARD offers the following observations.

## 1.0 General

The evaluation team faced a difficult task as a result of unforeseen political, institutional and economic changes occurring in Bulgaria throughout project design and implementation. Further abrupt and unpredictable changes were occurring while the team was in Bulgaria. They continued for the ensuing months. Despite these problems the team did an excellent job of analyzing the history of project development and of suggesting productive ways forward. ARD is broadly in agreement with findings and recommendations presented in the report.

## 2.0 Design Phase (Section 3)

**2.1** The team expended much effort on analysis of the design process and content. ARD agrees with most of the findings. However, it is difficult to recreate the enthusiasms and initial donor expectations that characterized the transition period and process in Central and Eastern Europe. Many thought that the transition would be relatively brief and smooth.

It seems almost inevitable in hindsight that the project would be at the center of a continuing political and institutional battle within the Bulgarian administration, unresolved two years after contract award. Yet we are unsure anyone could foresee in 1992 through 1994 that the reform process in Bulgaria would become so badly stalled. Several other countries in the region maintained a reform momentum, despite the return to power of “socialist” governments earlier in their political evolution than Bulgaria.

While ARD agrees with most of the findings regarding technical issues and delays during the design phase, we feel that the evaluation is overly harsh on USAID and the (then) Ministry of Environment during the design phase. This phase was finished to all intents and purposes before September 1994 (more than six months before the “socialist” government was formed). It had succeeded in generating much enthusiasm in both institutions. The formal design study was funded by the World Bank and managed by them and the Ministry of Environment. The extent to which USAID should bear responsibility for the shortcomings of this design is perhaps exaggerated.

Unfortunately institutional memory at USAID and the World Bank is insufficient to clarify this issue.

**2.2** *Choice of “pilot sites.”* The evaluation points out that Central Balkan and Rila National Parks are similar. Both are large, montane, IUCN category II protected areas. ARD agrees that GEF may have been able to contribute more (and avoid some problematic institutional issues), if a greater diversity of sites had been chosen.

Although these two parks are superficially similar, they are geologically, geomorphologically, hydrologically, and biologically distinct; they were new, and administratively represented little more than lines on a map. Together they covered approximately 50 percent, by area, of the protected areas network in the country. These two parks also happen to be the most important protected areas in Bulgaria from the perspective of cultural heritage (Central Balkans, as the bastion for the anti-Ottoman uprisings; Rila for its role in perpetuation and protection of the church/monastery). It is perhaps not as difficult to see why these parks were chosen as a project focus as the evaluation team suggests. ARD’s proposal expressed the intention of beginning management activities in one park, then applying them in the second in a step-wise fashion, to maximize the benefits of working in two somewhat similar areas.

**2.3** *Lack of legal/policy basis for project implementation.* ARD agrees with the findings of a legal analysis sponsored by the project. The existing laws, regulations, etc., are adequate to clearly allocate responsibilities for protected areas among government institutions. What is lacking is the political will to arrive at an effective and consistent institutional policy within the government as a whole, despite several efforts in the Ministry of Environment to bring the issue to the fore. Passage of a Protected Areas Law is a priority because of this political situation, rather than a strictly legal necessity.

### **3.0 Project Implementation (Section 4)**

The evaluation emphasis on design issues and problems of implementation leaves little room for an account of programmatic accomplishments. ARD is gratified by the findings related to the high quality of technical assistance, training, procurement, and project management. We feel that more emphasis could have been placed on the following points:

**3.1** ARD accepts that the *relationship with NNPS* as a whole did not develop as the project design intended. While the relationship with the head of NNPS and the NNPS project liaison was close and relaxed, contact with other staff was sporadic and not systematic. The head of NNPS discouraged development of systematic working relationships throughout NNPS, despite repeated requests from ARD. Clearly, it was not appropriate for ARD to develop such relationships independently from the head. Several NNPS staff have disagreements with the head concerning the project; some oppose the project; some show only cursory interest, as demonstrated by their unwillingness to attend project activities to which they are invited. These issues were discussed with the COTR on several occasions, leading to yet more attempts to engage all the staff of NNPS. ARD agrees that these efforts and issues should have been better

documented, but feels that serious and repeated efforts were made, even though they were largely unsuccessful.

**3.2** The *volume of project activities successfully completed* is mentioned only in passing. In the year and a half between fielding of the project and the evaluation, GEF completed 15 international consultancies, more than 100 Bulgarian consultancies and 17 formal events (training + other workshops/seminars). As the evaluation notes, these were of high quality and always appropriate.

Furthermore, recognizing the fragility of the project through most of the period, ARD placed emphasis on activities that could be of lasting value, even if the project was discontinued. Thus, comprehensive strategies were developed for various aspects of biodiversity conservation. These remain applicable for the foreseeable future. Implementation of these strategies has also emphasized “products” of value independent of the project’s continuation. Similarly, information gathered during scientific investigations of biodiversity in the two parks is of lasting value.

**3.3** *Diffuse human capacity building* is hardly mentioned by the evaluation team, yet this too has lasting value. The evaluation focuses on, and is correct in concluding, the tenuous nature of efforts to strengthen the MEW Park Administrations, given their lack of clear mandate and future. Yet GEF (and other donor projects, including prior USAID efforts) have helped to build a diverse, knowledgeable, and involved network of individuals, NGOs, and other interested parties through their involvement in project activities. These people (including those in the Park Administrations, should they move elsewhere) will remain as an important and active constituency and resource for future biodiversity conservation efforts.

## **4.0 Recommendations for the Future (Section 5)**

Conclusions, options, and recommendations of the evaluation team are well stated. That they came to similar conclusions as previous teams (unimplemented MoE proposals of 1993 to early 1995; aspects of project design; independent review of Fall 1995) reinforces the basic soundness of the project’s approach from a technical (i.e., biodiversity conservation) perspective.

Proposals for a phase of limited project activities for a significant period (to March 1998), while MEW puts in place an adequate institutional framework, formed the basis of an agreement between USAID and MEW shortly after the evaluation team left Bulgaria. The team also proposed that GEF should consider some additional directions for the future as outlined in Section 5.5. ARD is willing to review these in conjunction with USAID and MEW when the phase mentioned above (assuming that it is successful) is nearing completion. We also wish to note the following points which should be taken into consideration.

**4.1** Only nine months will remain in ARD’s contract (if a no-cost extension is approved, the project may continue for several additional months). It may be best to focus on further development of activities that have proven successful in the past, rather than embark in new directions which may have their own unforeseen problems. If an acceptable institutional

situation prevails, the limited resources and time remaining perhaps should be used in a concentrated effort to move towards the most achievable of existing project results.

**4.2** With the short time remaining, it is impossible that the project will fully achieve the original expected results. ARD's contract should be amended to reflect a mutually agreed-upon (MEW, USAID, ARD) set of modified results which focus project activities and resources most effectively.

In conclusion, ARD commends the evaluation team on their thorough work. These comments are intended to supplement their findings, rather than be contentious. Indeed, we feel that the evaluation could serve as a major catalyst for healthy development of biodiversity conservation in Bulgaria.

## Errata

---

ARD wishes to note the following omissions and errors arising from a review of the text of the Bulgaria GEF Biodiversity Project Mid-Term Evaluation Report.

- Section 1.3     The project had several meetings at the Deputy Minister level and numerous meetings at the Head of Department at MEW and CoF between February and June.
- Section 1.3.2   Last sentence para 2: see comments in ARD's letter in the front of this report; 3<sup>rd</sup> para: Head of NNPS did not *encourage* an institutional assessment - he would have "allowed" it without protest if USAID/ARD/MEW had insisted. As indicated elsewhere in the report, finding an appropriate time would have been extremely difficult given the MEW - COF issues.
- Section 1.4     Insistence on passage of new legislation by a given date is a difficult condition. The Executive branch cannot/should not determine the parliamentary timetable in detail. Also, it's possible to envision that parliament may be in the process of *improving* proposed legislation "by March" - would it be appropriate to discontinue in such circumstances? Targets should be realistic, but allow for some occurrences outside the control of those trying to meet the targets.
- Section 3.3.3   Memorandum of Understanding: ARD believes that it is conjecture that "the signatories were aware.... that the new government would be opposed to a MEW mandate for protected areas....". Some may have predicted such an attitude, but it was only made (unofficially) explicit to USAID/W and ARD a day or two before the COP's departure for Sofia, and never became an official government policy as confirmed in Section 4.1.
- Section 3.3.3   Choice of Pilot National Parks: no basis is given for the conclusion that "human pressures on the two Parks are not particularly strong." Clearly such pressures are quite variable in time and space, and will only get "stronger" if no effective system of administration is in place. Poaching, illicit felling, and improper visitor use are widely recognized as significant problems in some areas.
- Section 4.1     See comment on 1.3.
- Section 4.2.1   Findings: a) It is correct and important that NNPS has no *de jure* control over park-level bodies. In practice, MEW park administrations communicate with, and to an extent defer to, NNPS on many important issues. This situation is due in part to personal relationships and unwritten practice and is vulnerable to unpredictable change; therefore, b) viable proposals for "institutional structures for management of the network of protected areas in Bulgaria" exist prior to the

project. It makes little sense for “the project” to “produce(d)” additional ones under circumstances prevailing for most of the implementation period. The GEF Training Needs Assessment was a preliminary step towards development of an institutional assessment, and recommended that the latter be undertaken.

Appendix C. The introductory paragraph notes that this is an “initial attempt” to review implementation of the National Biological Diversity Conservation Strategy (NBDCS). Readers should be aware that the account is incomplete in that many more NGOs and academic research efforts have been involved than are recorded. This appendix fails to adequately reflect the wide range of interest groups that are involved in biodiversity conservation and have contributed to the broadest aspects of implementation of NBDCS.

# Table of Contents

---

Acronyms and Abbreviations	i
Preface	iii
1.0 Executive Summary	1
1.1 The Project	1
1.2 Project Design	1
1.3 Implementation	2
1.3.1 Progress Toward Achievement of Objectives	3
1.3.2 Project Management	4
1.3.3 Overall Progress Toward Project Purpose	4
1.4 Essential Conditions Under Which the Project Could Go Forward	5
1.5 Recommendations	5
2.0 Introduction	7
2.1 Brief Overview of the Bulgaria GEF Biodiversity Project	7
2.2 Purpose of the Evaluation	8
2.3 Readers' Guide to the Organization of the Report	8
3.0 Evaluation of Project Design	11
3.1 Historical Summary of the Design Process	11
3.2 Coherence of Project Purpose, Objectives, and Tasks	14
3.2.1 Project Purpose	14
3.2.2 Project Objectives and Tasks	14
3.2.3 The Project Results Framework	15
3.3 Project Design Issues	16
3.3.1 Design Methodology	19
3.3.2 Design Assumptions	19
3.3.3 Strategic Design Issues	20
3.4 Design Strengths	22
3.5 Summary	23



4.0	Evaluation of Project Implementation	25
4.1	Historical Summary of Project Implementation	25
4.2	Overall Progress Toward Achievement of Project Objectives	28
4.2.1	Objective 1: Institutional Support for MEW and its Partners	28
4.2.2	Objective 2: Pilot Development of Protected Areas Management	32
4.2.3	Objective 3: Development of Alternative Financial Mechanisms for PA Management	37
4.2.4	Objective 4: Procurement of Equipment for the Pilot National Parks	38
4.2.5	Progress on Intermediate Objective A.4	39
4.2.6	Training	39
4.3	Evaluation of Project Management	41
4.3.1	Summary Description of Project Management	41
4.3.2	Evaluation of USAID's Management of this Project	42
4.3.3	Evaluation of ARD's Management of this Project	43
4.3.4	Role of GOB/MEW in Project Management	45
4.3.5	Effectiveness of the National Project Steering Committee	45
4.3.6	Role of the Global Environmental Facility	45
4.4	Donor Coordination	46
4.5	Overall Performance of Implementing Agencies	47
4.6	Overall Progress Toward the Project Purpose	47
5.0	Options and Recommendations	49
5.1	Brief Review of the Current Situation	49
5.1.1	Political/Economic Context	49
5.1.2	MEW Commitment to Protected Areas Management	49
5.1.3	Current MEW Institutional Structure for Biodiversity Conservation and Protected Areas Management	49
5.1.4	Interministerial Collaboration Between MEW and MAFAR on Protected Areas Management	50
5.1.5	Overall Project Status	50
5.2	Essential Conditions for the Project to Go Forward	50
5.3	Institutional Options under Which the Project Could Go Forward	51
5.3.1	Overview of the Three Options Identified	51
5.3.2	Option I: Creation of Institutional Capacity Within MEW	51

5.3.3	Option II: Creation of a New, Independent Institute	52
5.3.4	Option III: Creation of a Protected Areas Management Unit in MAFAR	54
5.4	Preferred Option: Institutional Capacity Development Within MEW	55
5.4.1	Rationale for the Evaluation Team's Preference	55
5.4.2	Institutional Changes Needed	58
5.4.3	Institutional Roles in Protected Areas Management under Option I	59
5.4.4	Need for an Institutional Assessment of Biodiversity Conservation Functions	63
5.4.5	A Strategy for Proceeding with Option I	63
5.4.6	MOU Revisions Needed Under Option I	64
5.5	Other Recommendations	65
5.5.1	Movement Between CLINS	65
5.5.2	Increase in Obligations to Match the Amount of the Contract	65
5.5.3	Increased Attention to Linkages Between Science and PA Management	65
5.5.4	Support for Biodiversity Conservation in the Forestry Sector	66
5.5.5	Support for a Five-Year Review of the National Biodiversity Conservation Strategy	66

## Appendices

Appendix A: Statement of Work for the Evaluation

Appendix B: List of People Interviewed

Appendix C: Review of Progress on Activities Recommended in the  
Bulgarian National Biological Diversity Conservation Strategy

Appendix D: The Evaluation Team

Appendix E: The Evaluation Methodology

## Acronyms and Abbreviations

---

ARD	Associates in Rural Development, Inc.
CLIN	Contract Line Item Number
CoF	Committee of Forests
COP	Chief of Party
COTR	Contracting Office Technical Representative
GEF	Global Environmental Facility—In Bulgaria, synonymous with the USAID Biodiversity Project
GOB	Government of Bulgaria
MAFAR	Ministry of Agriculture, Forestry and Agrarian Reform
MEW	Ministry of Environment and Waters
MoE	Ministry of Environment
MOU	Memorandum of Understanding
NBDCS	National Biological Diversity Conservation Strategy
NNPS	National Nature Protection Service
PACD	Project Assistance Completion Date
PMU	Project Management Unit
PPA	Project Preparation Advance
PSC	Project Steering Committee
REI	Regional Environmental Inspectorate
SOW	Statement of Work
SRA	Senior Resident Advisor
STTA	Short-Term Technical Assistance
TDY	Temporary Duty Assignment
TOR	Terms of Reference

## Preface

---

The Bulgaria Global Environmental Facility Biodiversity Project (GEF)<sup>\*</sup> is the culmination of collaboration between the Ministry of Environment (MoE) in Bulgaria and the United States Agency for International Development (USAID) in the area of biodiversity conservation over the period 1991-1995.

Preceding collaborative activities, including development of a National Biological Diversity Conservation strategy and work in Bulgaria with the U.S. National Parks Service, led to the development of the GEF Project. Through its Global Environmental Facility operations, the World Bank provided Project Preparation Assistance to MoE to conduct a biodiversity project design.

Associates in Rural Development, Inc. (ARD) was awarded a contract to assist the Government of Bulgaria implement the project in July 1995 (USAID Contract Number DHR-0039-C-00-5070-00). ARD is supported by three subcontractors: the Institute for Sustainable Communities, RESOLVE, and Sheppard Robson International.

The three-year project assists MoE, other government organizations, including the Committee of Forests, and diverse interested parties in:

- developing a collaborative Bulgarian system of administration and management for National Parks and protected areas through development of management plans for Central Balkan and Rila National Parks;
- strengthening biodiversity conservation institutions (with emphasis on MoE's National Nature Protection Service and park-level agencies);
- developing financial mechanisms to support biodiversity conservation in the long term; and
- providing equipment to carry out the preceding tasks.

GEF is a three-year project with two phases of equal duration. During the first phase, technical assistance, training, and procurement will focus on development of planning skills, management planning, and financial studies. Phase II will begin pilot implementation of plans and findings from Phase I.

---

<sup>\*</sup> In an international context "GEF" refers to the multi-lateral Global Environmental Facility administered by the World Bank, United Nations Development Program and United Nations Environment Program. In Bulgaria the term GEF (pronounced "Jeff") has become synonymous with the USAID Biodiversity Program. GEF is used as the project acronym in this and other reports. USAID's Global Environmental Facility activities result from a parallel bilateral funding option during the pilot phase of the "international" Global Environmental Facility.

The project operates through ARD's Project Management Unit (PMU) based in Sofia. The PMU comprises a Senior Resident Advisor/Chief of Party, Project Coordinator, Training Coordinator, and support staff. Most technical assistance and training is provided by Bulgarian consultants. International consultants furnish assistance from their broader experience and perspective, or on issues especially relevant to Bulgaria's transitional status.

## **1.0 Executive Summary**

---

### **1.1 The Project**

A mid-term evaluation of the Bulgaria GEF Biodiversity Project was conducted from mid-June to mid-July 1997. This is a formative evaluation that is focused primarily on modifying the project as appropriate to better achieve its objectives using the remaining time and resources available. The project is a three-year, \$4 million USAID project that was designed as part of USAID's parallel funding support to the Global Environmental Facility's biodiversity conservation focal area. The former Ministry of the Environment (MoE), now Ministry of Environment and Waters (MEW), is the principal Government of the Republic of Bulgaria (GOB) collaborating agency. The contract for implementation was awarded to ARD, Inc. of Burlington, Vermont in July 1995. ARD is responsible for technical assistance, training, and procurement of equipment. To accomplish this, ARD has created a Project Management Unit in Sofia staffed with one Senior Resident Advisor, two Bulgarian professional staff and support staff.

The Bulgaria GEF Biodiversity Project seeks to improve biodiversity conservation in Bulgaria through institutional capacity-building at national, regional, and local levels. This was to be accomplished primarily through the creation and development of a National Nature Protection Service (NNPS) under the umbrella of the Ministry of Environment. The project is intended to support this National Service's capacity to assure biodiversity conservation functions at the national and regional levels and to build totally new capacity for managing protected areas. The latter was to be accomplished through development and implementation of pilot protected area management plans at Rila and Central Balkans National Parks and through development of the capacity within the National Service headquarters for the administration of Bulgaria's system of protected areas. The GOB Ministry of Environment is responsible for creating the institutional structure of the National Service, for its staffing, and for its operating expenses as defined in an intergovernmental Memorandum of Understanding (MOU) signed in January 1995.

### **1.2 Project Design**

The Evaluation Team found that the project design lacked clarity and logical coherence in its presentation of purpose, objectives, and tasks. These were reformulated after the project began using USAID's results framework, and the resulting document is much more precise and coherent. Overall, the results framework reflects the original design quite accurately, but places a significantly greater emphasis on building a constituency for biodiversity conservation. The Evaluation Team finds this to be appropriate.

Numerous shortcomings were found in the design. Unlike the very successful, participative process used for the preparation of the National Biological Diversity Conservation Strategy, the most basic decisions of project design were made by a relatively small group. Basic, largely unwritten, assumptions were made that proved false. It was assumed that draft legislation that had been pending for several years would have been passed by project start-up and that this

legislation would have given the MEW a clear mandate for protected areas management and a clear institutional structure for biodiversity conservation and protected areas management. The law was not passed. It was assumed that the long-standing conflict with the Committee of Forests (CoF) over the institutional mandates for protected areas management had been resolved giving MEW clear authority. The powerful CoF remained opposed until early this year resulting in major delays to project implementation. It was assumed that the National Nature Protection Service as envisaged in the design could be created and could develop into a self-sustaining institution during the three-year life of the project, including totally new institutional capacity for protected areas management. At the time of the evaluation, the institutional structure of this National Service, as envisaged in the design, has not yet been created by MEW.

It was apparently assumed that the inter-governmental MOU governing the project would suffice in the absence of protected areas legislation. It has not. The design linked the project's fate strongly to one institution, the Ministry of Environment and its commitment to protected areas management, and to the creation of the National Service. The Ministry has never shown clear commitment to developing its own capacity for protected areas management and has not created the National Service as envisaged. The design focused strongly on protected areas to the exclusion of a range of other potential strategies for biodiversity conservation outlined in the National Biological Diversity Conservation Strategy (NBDCS). The potential pitfalls presented by the long-standing institutional conflicts over the mandate for protected areas management were well-known. Finally, the two national parks chosen for the pilot management planning consist of two relatively similar sites with relatively limited opportunities for learning. They are both protected areas where the turf battles between MEW and CoF have been the strongest. A different choice could have provided greater opportunities for learning while avoiding at least part of the resistance from CoF.

### **1.3 Implementation**

USAID awarded ARD, Inc. the contract for project implementation in July 1995. The following month, the new, pro-socialist government that was formed during the project proposal review stage made known its intention to transfer protected areas management, and the project, to the Committee of Forests. Project start-up was postponed and USAID marshalled unanimous donor opposition to this change. The government backed down in early 1996 after a half-year's delay, but the CoF remained a reluctant partner and walked out of the annual work planning workshop in May, creating a new crisis in the project. This was partially resolved in August 1996 with the signing of a tripartite letter of agreement among MEW, CoF, and USAID. MEW then began the creation of park-level bodies and formed the Project Steering Committee called for in the MOU. The dispute between MEW and CoF again flared in late 1996 and the PSC was unable to resolve it. Despite this, the project began intensive work on park management planning and on training of the newly recruited staff of the park-level bodies.

At this point the project was overtaken by larger events. The economy collapsed contributing to a political crisis that led to the formation of an interim, caretaker government in February 1997. Parliamentary elections were held in April and a new government was put in place shortly before the arrival of the Evaluation Team. The CoF became a part of the agricultural ministry with new

leadership much more disposed to collaboration with the new Ministry of Environment and Waters and with the project. The project had no formal contact with the GOB during from February until well after the arrival of the Evaluation Team.

### **1.3.1 Progress Toward Achievement of Objectives**

The first objective is to provide overall institutional support to develop the capacity of the National Service within MEW to assure the conservation of biodiversity in Bulgaria and to manage the country's network of protected areas. This National Service has not been created. Although pieces of what the National Service should be, exist, they are just pieces lacking any coherent institutional structure. Progress on Objective 1 has been very marginal.

Objective 2 involves the development and implementation of pilot management plans for two national parks. Work on this started a year late because of the opposition of the powerful Committee of Forests to an MEW mandate for protected areas management. CoF has created their own park management units which, at the time of the evaluation, were working independently, in parallel with the park-level bodies that have been created by MEW. The institutional status and mandates of MEW's park-level bodies are very unclear. They have no meaningful budget for operating expenses and are staffed primarily by professionals on short-term contracts. They are not part of a national system of protected areas management because there is no such system.

Support for these park-level bodies and for protected areas management capacity has become the principal focus of the project. Good progress has been made on developing a common understanding of the modern notion of protected areas management. About 70 national consultants have been conducting studies needed for the planning process. A series of workshops and training events have contributed substantially to the human resources development of the park-level body staff and of their collaborators in CoF, NGOs, municipalities, and tourism boards. This work has been complemented by several international consultants that have provided expertise unavailable locally.

Overall progress on Objective 2 has been substantial but it is very tenuous because of the institutional status of the park-level bodies and because of the lack of a national system of protected areas management. The technical approach and results of the project are basically very sound. It is the institutional commitment of the MEW that is lacking. MEW's park-level bodies have no clear institutional status and no clear mandate for protected areas management. They are not part of a coherent institutional structure for protected areas management in Bulgaria. The staff of the park-level bodies have no meaningful operational budget. The focus of this \$4 million project to date has been on a group of 11 people with little job security, most of whom are on one- or two-month contracts.

Objective 3 calls for the identification and development of alternative financial mechanisms to fund protected areas management. An initial analysis has been done, but, in the absence of any defined institutional structure for park management, it makes little sense to go further at this point. Progress has been moderate. Objective 4 is procurement of equipment for the two pilot



parks. Basic office equipment was procured, but everything else has been put on hold by USAID subject to the GOB fulfilling their commitments under the MOU. Progress has been marginal.

### **1.3.2 Project Management**

USAID's management of the project design and award was relatively poor. Since the project began, their attempts to keep the project on track despite the design flaws and the conflict between CoF and MEW have been very good. This is hampered by the geographic location and physical isolation of the COTR's office in Washington, DC. The OAR office has been exceptionally supportive of the project and has twice used its influence at very high levels of the GOB in attempts to get the GOB to respect its commitments under the MOU. Success has been only partial, however. The working relationship between USAID/Washington, its OAR office in Sofia and ARD is an exceptionally good one.

ARD has performed very well in their management of this project. Their project management unit in Sofia is staffed by an exceptionally qualified and dedicated team with two Bulgarian professionals and a senior technical advisor from ARD's home office. Under the circumstances that have prevailed, the PMU has frequently been called on to play a much greater role of diplomat and negotiator than a contractor is normally called upon to do, and they have played this role quite well. Their technical approach has been sound and delivery of training and technical assistance, procurement, and reporting have all been well-managed. They have been less successful in focusing attention on the need for MEW to create the institutional framework called for in project design.

The major management problem on this project has been the failure of the GOB/MoE/MEW to respect the commitments made under the MOU. The project is supposed to support the development of a new institution to be created under the umbrella of MEW. This new institution is to have overall responsibility for biodiversity conservation and protected areas management and is to have national, regional, and local (protected area) components. MEW leadership has not created the institution that the project is intended to support. The MEW department head for nature protection did not allow the project to conduct an overall institutional assessment of their existing institutional structures for biodiversity conservation and they have not responded positively to project requests for the establishment of clear counterpart relationships with their existing staff at the national level.

### **1.3.3 Overall Progress Toward Project Purpose**

While the project has begun to make significant progress in developing the human resource skills in the area of protected areas management planning at the two pilot national parks, this capacity is not becoming institutionalized. The GOB has failed to create a coherent institutional framework for biodiversity conservation and protected areas management for the project to support. The GEF Project is not viable in its current institutional context.

## **1.4 Essential Conditions Under Which the Project Could Go Forward**

Given the history of the project to date, the Evaluation Team considers it to be essential that new protected areas/biodiversity conservation legislation be passed by the GOB if the project is to go on. If new legislation is not passed by March 1998, the project should be discontinued. If the project is to continue, either MEW must create the National Nature Protection Service in the institutional form defined in the project design and the MOU, or the GOB should create a completely new institution for protected areas management outside of the MEW. Two other such institutional options are defined by the Evaluation Team.

The Evaluation Team believes that MEW is the most appropriate institutional home for biodiversity conservation and protected areas management, but this needs to be formalized with clear, new legislation. The Evaluation Team strongly recommends that GOB/MEW push for passage of new legislation that gives MEW a clear mandate for protected areas management and that creates a new, semi-autonomous institution for biodiversity conservation and protected areas management under the umbrella of MEW. If GOB/MEW agree to fulfill these conditions, the Project should enter an interim phase that would end when the conditions are met (but that would not go beyond the end of March 1998). During the interim phase, the Project activities should focus on assistance to the GOB to undertake the needed institutional/policy/legislative reforms.

## **1.5 Recommendations**

MEW should create one coherent institutional structure (the National Service) that is responsible for overseeing all aspects of biodiversity conservation and that is directly responsible for protected areas management in Bulgaria. This National Service should consist of a national headquarters, protected area management units in the field, and biodiversity units housed in the Regional Environmental Inspectorates (REIs).

The National Service headquarters should be responsible for:

- development of national policies on biodiversity conservation;
- development of national outreach programs for biodiversity conservation;
- GOB's representation/commitments to international treaties and conventions concerning biodiversity conservation (five at present);
- management of Bulgaria's system of protected areas. Headquarters' functions will include development of an information base on the network, establishment of national priorities, development of guidelines, monitoring and evaluation, and administration of the network of protected areas management units; and
- initiation and oversight of the management planning process for individual protected areas.

The National Service's protected area management units should be responsible for managing individual protected areas (i.e., for implementation of protected area management plans). These park-level management units will be directly under the technical and administrative direction of the national headquarters. Many of the management functions may be achieved through the development of partnerships and interagency agreements with other organizations, but the direction and leadership should come from MEW/National Service employees. The rest of the staff could be a mixture of MEW employees and others seconded under interagency agreements from Forestry, municipalities, tourism boards, and others.

Forestry's role in protected areas management must be negotiated between MEW/National Service and MAFAR/Forestry. Forestry's role in the management of each protected area should be primarily a function of the protected area status and the defined management objectives and management activities for the individual protected area. In non-forested protected areas, Forestry may have no role at all. In other areas, they may play a very large role. Forestry's roles could include interventions for the management of flora and fauna in protected areas, fire detection and suppression, patrol and surveillance, facilities and infrastructure management, visitor use and service functions, and public education. Municipalities, NGOs, museums, tourism boards and other groups should also play a wide range of management roles under management agreements with the National Service's protected area management units.

## **2.0 Introduction**

---

### **2.1 Brief Overview of the Bulgaria GEF Biodiversity Project**

This report presents the findings and recommendations of the mid-term evaluation of the Bulgaria Global Environment Facility Biodiversity Project. The project was developed in the context of the optimism and the political and economic confusion of the aftermath of the break-up of the Soviet Union. It was developed jointly by USAID and the World Bank with the GOB Ministry of Environment. The project is part of USAID's contribution to the Global Environment Facility within the GEF focal area of biodiversity conservation. Unlike most GEF projects, this project is administered directly by USAID under a parallel funding mechanism.

Bulgaria has biodiversity of international significance with some of the largest and least-altered natural areas in Europe. Much of the biodiversity is found in Bulgaria's protected areas, but Bulgaria has never had an institutional structure for the administration and management of its network of protected areas. The modern concepts of protected areas management and management planning were developed little in Bulgaria prior to this project.

The Bulgaria GEF Biodiversity Project seeks to improve biodiversity conservation in Bulgaria through institutional capacity-building at national, regional, and local levels. This was to be achieved primarily through the creation and development of a National Nature Protection Service under the umbrella of the Ministry of Environment. The project is intended to support this National Service's capacity to assure biodiversity conservation functions at the national and regional levels and to build totally new capacity for managing protected areas. Pilot protected area management plans are to be developed and implemented at Rila and Central Balkans National Parks and capacity developed within the National Service's headquarters for the administration of Bulgaria's system of protected areas. The GOB Ministry of Environment is responsible for creating the institutional structure of the National Service, for its staffing and for its operating expenses as defined in an intergovernmental MOU signed in January 1995.

The Bulgaria GEF Biodiversity Project is a three-year, US\$ 4 million project administered directly by the USAID ENI/EEUD/ENR office in Washington, DC. The former Ministry of the Environment, now Ministry of Environment and Waters (the acronym, MEW, will be used throughout the report to refer to both), is the principal GOB collaborating agency. The contract for implementation was awarded to ARD, Inc. of Burlington, Vermont in July 1995. ARD is responsible for technical assistance, training, and procurement of equipment. To accomplish this, ARD has created a Project Management Unit in Sofia staffed with one Senior Resident Advisor, two Bulgarian professional staff, and support staff.

## **2.2 Purpose of the Evaluation**

This mid-term project evaluation was scheduled as part of the project design. This is typical for USAID-funded projects. What is not typical is that the Contractor, ARD, has been charged with compiling and hiring the evaluation team themselves, albeit with USAID's concurrence.

Normally mid-term and final evaluations of USAID projects are "independent" evaluations done by a third party under contract with USAID. The SOW for this evaluation, however, makes it clear that this is to be a "formative" evaluation. The basic purpose of this evaluation is to bring in an evaluation team that can review the design and implementation of the project to date, and, more importantly, work with the Contractor and USAID to formulate strategies and recommendations that will enable the project to better achieve its objectives within the remaining time and resources available—thus the word "formative." The emphasis of this evaluation is less on judging the performance of the different implementing agencies to date and more on how to improve project performance during the remaining life-of-project through PACD. The full SOW for this evaluation is quite lengthy. It is presented in Appendix A of this report.

The Evaluation Team strongly supports the idea of a formative mid-term evaluation focused on improving project implementation throughout the life of project. They further believe that, for such a formative evaluation, it is appropriate that the Contractor take the lead in putting the evaluation team together. The Contractor will be judged on overall performance at the end of the project and should have a strong interest in modifying/improving strategies for achieving project objectives during the remaining life of project.

The Team, however, does not believe it would be appropriate for the Contractor to recruit the Team under a situation where a positive working relationship between USAID and the Contractor does not exist. Under such circumstances, it would probably be best for a third party to conduct the evaluation. Fortunately, this was not the case on this project; the working relationship between USAID and the Contractor was one of the best that any of the Team members had ever encountered. The Evaluation Team believes that final evaluations of projects should be conducted by third parties, and not by the Contractor.

## **2.3 Readers' Guide to the Organization of the Report**

This report is organized into an introduction, an evaluation of project design, an evaluation of project implementation, followed by a presentation of options and recommendations for the future, and then five appendices. This section, 2.0 Introduction, presents a brief overview of the project and a presentation of the purpose for this mid-term evaluation.

Section 3.0 is the Team's evaluation of the strengths and weaknesses of the project design. The Team found several important design flaws that have seriously affected the implementation of the project. Section 3.1 reviews the key steps/events during the project design in both table and text format. Section 3.2 then analyzes the clarity and logical coherence of the project's purpose,

objectives, and tasks, including their reformulation within USAID's new results framework. Section 3.3 evaluates the design in terms of methodology, assumptions (largely unwritten), and its key strategic elements. Section 3.4 summarizes the strengths of the design, and Section 3.5 presents a summary to this chapter.

Section 4.0 evaluates the implementation of the project with two major sections evaluating progress made toward achievement of the technical objectives of the project and a second on project management. Section 4.1 reviews key events in project implementation both in table and text format. Section 4.2 evaluates progress to date toward achievement of the four main project objectives as presented in the Project SOW followed by a brief section on training. Evaluation of project management in Section 4.3 covers the roles of USAID/Washington, USAID/OAR/Sofia, ARD/Burlington, and ARD/PMU in the delivery of technical assistance and training and in procurement within the framework of the design. It evaluates the GOB/MEW's roles in fulfilling its obligations under the Project MOU. Section 4.4 covers donor coordination, Section 4.5 summarizes the overall performance of the main implementing agencies, and Section 4.6 presents a statement of overall progress of the project as a whole.

Section 5.0 is the key chapter that presents conditions, options, and strategies for moving forward on the project. Section 5.1 starts with a review of the present situation, Section 5.2 presents the essential conditions under which the project could go forward, and Section 5.3 defines three institutional options under which this could happen. Section 5.4 then develops the preferred option in considerable detail, and Section 5.5 ends with other related recommendations.

There are five appendices to this report. Appendix A is the SOW for the evaluation. Appendix B is the list of persons contacted, and Appendix C is a summary of progress made in implementing the National Biodiversity Conservation Strategy prepared by team member Petar Iankov. Appendix D presents brief biographical sketches of the Evaluation Team members, and Appendix E presents the Team's evaluation methodology.



## 3.0 Evaluation of Project Design

---

### 3.1 Historical Summary of the Design Process

Table 1 presents an historical summary of the key events in the design of the GEF Bulgaria Project. It includes both specific design-related events as well as the key political changes that were occurring simultaneously.

The move toward democratic change that led to the fall of the Communist government began in Bulgaria in 1989. USAID has been involved in the environment sector in Bulgaria at least since 1991 when there were a series of TDYs by USAID, EPA, and the World Bank. The concept that developed into the GEF Bulgaria Biodiversity Conservation Project originated in the period 1991-1992, although many specific events are now difficult to pin down six years later.

In 1992 and 1993, USAID funded the preparation of the National Biological Diversity Conservation Strategy for Bulgaria through the Biodiversity Support Program. Published in 1994, the NBDCS was one of the earlier national biodiversity strategies developed in the world and has been recognized as one of the better examples of such a strategy. Although not officially adopted by the GOB as national policy, the NBDCS has become a very influential “de facto” policy document for the country. At the time, the strongly participatory process employed in developing the strategy was perhaps as important as the product. Bulgaria had just emerged from 45 years under a Communist “command structure” of government. The opportunity for different stakeholders to openly air and debate their different points of view in a public forum was a foreign and exciting experience for most of the participants in this process.

The formal design process of the GEF project began just after completion of the draft NBDCS. Through an unusual agreement, the World Bank agreed to fund the project design through a Project Preparation Advance (PPA), and USAID agreed to fund project implementation. Furthermore, USAID decided to do this as part of their contribution to the Global Environmental Facility in the GEF focal area of biodiversity conservation. This meant that the design had to be approved by GEF, that the project would be open to international bidding, and that USAID’s normal restrictions on sourcing for procurement would not apply.

The most critical decisions of the project design were made in about mid-1993 during the preparation of the TOR for the PPA-funded, competitively awarded design document preparation. These TOR specify that the project would focus on the development of protected areas management institutional capacity in the Ministry of the Environment, and that Rila and Central Balkans National Parks would be the two focal field sites for management planning (the TOR called for the preparation of management plans for these two parks as part of the design). The Evaluation Team was not able to determine who, on the donor side, made these key decisions or what their exact reasoning was. It is almost certain that both the World Bank and USAID jointly developed and/or approved these TOR with MEW.



**Table 1: Events Prior to Contract Award**

<b>Date</b>	<b>Project Related Event</b>	<b>Political Event</b>
<b>1991</b>	National Environmental Strategy and Action Plan prepared Idea for creation of NNPS raised by the MoE as one of the priorities identified by the National Environment Strategy and Action Plan	Coalition Government, unrealistic Expectations for rapid positive changes; real possibilities for improvement of some institutions
June	USAID, WB and US EPA undertake a series of environment missions to Bulgaria, this leads to decision to develop a GEF biodiversity project	
	Draft Protected Areas act prepared and submitted to the Parliament	
October 31 <sup>st</sup>	Central Balkan NP created	
	Initial concept for GEF biodiversity project developed with WB and USAID	
November		First UDF government, some Signs of improvement in the situation
<b>1992</b>		Pro-‘socialist’ Government, but MoE Minister Bosevski highly committed to biodiversity conservation
January	Idea for creating NNPS discussed at the National Palace of Culture Meeting, supported by the scientific and nature conservation community and NGOs, but strongly opposed by the CoF	
March-December	Bulgaria Environment Strategy Study, World Bank Rila NP created	
August	Study tour to US National Parks for senior staff of MoE and CoF	
November		
<b>1993</b>		
January		
March	NBDCS completed with USAID/BSP support	
July	Ribaritza Information Workshop for MoE and CoF local staff	
October	WB through the GEF approves a PPA	
<b>1994</b>		
January	USAID sets Nov 1994 as target date for contract award	
	TOR for GEF design prepared with focus on MoE institutional capacity for protected areas management with Rila and Central Balkan pilot parks	
	MoE awards bid for design to SECA with WB funding	

**Table 1: Events Prior to Contract Award**

Date	Project Related Event	Political Event
February-May	SECA prepares project design	
March 1st	National Nature Protection Service created as department in MoE	
May	NBDCS published	
May	Project design completed by SECA; design is detailed and prescriptive	
September 8th	National Nature Protection Service Regulations established by MoE administrative 'order'	
September	USAID issues Request for Proposals	Interim government
November	Council of Ministers approves the project	
December	Bulgaria Environmental Strategy Study Update and follow-up	
December	Project proposals submitted	
December 20th	Approval by the Councils of Ministers for signing of MoU	
<b>1995</b>		
January	MoU signed between government of USA and Bulgaria with both parties aware a new 'socialist' government was coming that would be opposed to MoE mandate for protected areas management	
January to May	Major delays in the analysis of proposals by USAID	
February		New 'socialist' Government
May	Clarifications requested of bidders	
June	Best and Final offers of leading proposals requested	
July 11th	Contract awarded to ARD, Inc.	

The Ministry of Environment awarded the design to a French consulting firm called Société d'Eco-Amenagement (SECA) in January 1994. The resulting design was highly detailed and prescriptive. USAID then prepared a much more general RFP that was less prescriptive allowing bidders more room for initiative in their proposals. The RFP was released in September 1994 and proposals were submitted in December 1994. After some very significant delays in the review of the proposals, USAID awarded the contract to ARD, Inc. in July 1995. In the SOW that was intended to be Attachment 1 to the USAID/ARD contract (but was never actually attached), a footnote on page 3 specifies that the SECA document, "*should be viewed as an illustrative document only.*"

In the meantime, a protracted process of drafting and negotiation of a MOU between the GOB and the Government of the United States had been underway. This serves as a formal bilateral accord between the two governments. It was approved by the Council of Ministers of the GOB and then signed by the two parties in January 1995 with the Minister of MEW representing the GOB. The following month, a new pro-socialist government was elected and the Minister of Environment who had been strongly supportive of the development of a National Nature Protection Service with the mandate and capacity for protected areas management, was replaced by a new minister who did not share the same views.

## 3.2 Coherence of Project Purpose, Objectives, and Tasks

USAID project designs normally include a “logframe” or logical framework which presents inputs leading to activities that contribute to achievement of project objectives (realizable during the life of the project) that contribute to a high-level purpose. The GEF Bulgaria project design does not include a logical framework.

### 3.2.1 Project Purpose

This project was designed as part of USAID’s contribution to the Global Environmental Facility (GEF) within the GEF focal area of biodiversity conservation. One would expect to find this clearly reflected in the project purpose. The purpose of this project as stated in Section 2.0 of the SOW of the USAID/ARD contract is,

*“The [project] focuses on strengthening the nature protection management system at the national and regional/local levels. This will include establishment of an institutional framework and development and implementation of sound management strategies for the protection of areas of significant biodiversity.”*

This statement of purpose is a weak one. It places the strongest emphasis on institutional strengthening, but does not present a clear statement of the purpose of this capacity-building. Institutional strengthening is clearly a means toward achieving a higher purpose, not an end in itself. It does state that the project purpose “*will include...protection of biodiversity*” leaving the impression that the main purpose is something else.

### 3.2.2 Project Objectives and Tasks

Immediately after the statement of purpose, Section 2.0 of the SOW states,

*“In order to meet these objectives (this is very confusing, because it refers to the statement of purpose as the objectives), the Bulgaria GEF Biodiversity project will:*

*(a) support the implementation of Bulgaria’s biodiversity conservation strategy (including the support for the consolidation of conservation functions under the newly established National Nature Protection Service (NNPS)*

*(b) develop financial mechanisms (i.e., nature tax and user fees) to fund a self-sustaining protected area program*

*(c) develop protected area management planning and implementation processes, and demonstrate park development through site specific management programs. This includes....development of management plans for the Central Balkans National Park...and Rila National Park*

*(d) provide equipment for the management of the Central Balkans and Rila National Parks.*

We shall refer to (a) through (d) as the project objectives. Objectives b, c, and d are logically consistent with the purpose of conserving biodiversity through institutional strengthening, although they make it clear that the project will focus strongly on the specific area of institutional capacity development for protected areas management.

The wording of objective (a), however, is problematic. *“Support the implementation of Bulgaria’s biodiversity conservation strategy..”* is an extremely broad statement. Institutional strengthening of the MEW and the NNPS for biodiversity conservation and protected areas management are relatively small elements of the NBDSCS, (and were recognized in the NBDSCS as problematic ones at that). Although it has not been done, this statement could have been interpreted to include many types of activities that were not foreseen in the project design. The second portion of objective (a) is also worded very poorly, *“including the support for the consolidation of conservation functions under the...NNPS.”* Consolidation of conservation functions could easily be interpreted to mean that NNPS should be directly responsible for all forest management, all soil and water conservation, all fish and game management, etc., although this was almost certainly not the intent. This wording would indicate a lack of a natural resources management background on the part of those that drafted this SOW.

In Section 4.0 of the SOW, the above four objectives reappear as tasks and sub-tasks (although the linkage is not explicit). The statement of each task is substantively different from those in Section 2.0 of the SOW. This is most apparent in the restatement of objective (a) which reappears as,

*“The Contractor will strengthen the capacities of the [MEW]/NNPS.... to develop essential components of protected area administration including institutional coordination and administration, protection and conservation.....”*

The first statement of objective (a) has no mention of protected areas management and the second is totally focused on protected areas management. This leaves the design open to wide variations in its interpretation. The Evaluation Team concludes that there are serious shortcomings to the logical coherence in the statement of purpose, objectives, and tasks in the design SOW of this project.

### **3.2.3 The Project Results Framework**

The Project was designed before USAID’s re-engineering process had led to the adoption of the results framework for project design. The USAID COTR who took over project management just after project start-up requested the project staff to recast the project’s objectives and tasks into the language of the new results framework. Under the framework that emerged, an overall Project Objective is supported by two major “Results” which, in turn, are supported by “two levels of Intermediate Results.” This framework is intended to better define the specific results to be achieved during the project and to make the relationships between results and overall project objectives explicit.

The overall project objective has been recast as, *“Improved management systems for biodiversity conservation in Bulgaria.”* Result A is, *“stronger and more effective institutional structures and policies for management and administration of biodiversity conservation are operational.”* Result B is, *Effective management regimes are adopted and operational in two National Parks.”* The results framework hierarchy for the two major results are presented in Figures 1 and 2. The Evaluation Team finds that the results framework that was produced is a much more coherent statement of what the project is attempting to achieve than the poorly worded, sometimes inconsistent presentation in the original SOW. Given the garbled nature of the original SOW, it is probably fortunate for the project that they went through the exercise of recasting objectives and tasks as a results framework.

The Project SOW, however, is the basic document against which the Evaluation Team was asked to evaluate project implementation. In theory, there should be no disagreement between this results framework and the purpose, objectives, and tasks of the SOW. The principal differences noted by the Evaluation Team is at the level of Intermediate Result A.4, *“Improved understanding and support for biodiversity conservation nationally and internationally.”*

Actions to achieve this include building a constituency for biodiversity conservation at all levels of Bulgarian society, incorporating biodiversity conservation information into school curricula and the coordinating donor activities for biodiversity conservation. While this seems to go beyond what was foreseen in the original design, the Evaluation Team believes they are all appropriate, especially in hindsight. Building a constituency is especially critical under the new economic conditions, with frequent changes in governments and with the need to push new protected areas legislation through Parliament. It has also been possible for the project to move forward on these activities independently from the required institutional reforms that have not been made within the MEW and despite the conflicts between Environment and CoF.

The PMU team found the results framework exercise to be a very useful tool for developing their strategic thinking about the projects. They have found it cumbersome, however, for reporting on this project which has experienced delays and blockages on so many of the Intermediate Results.

### **3.3 Project Design Issues**

Several features of the project’s design phase have had serious, negative impacts on the project’s progress in meeting the overall goal of promoting biodiversity conservation capacities and activities in Bulgaria. These features include the methodology followed in developing the original design, the assumptions upon which the design was based, and the lack of explicit links to the concurrent development of the NBDCS.

***Insert Fig. 1***

***insert Fig.2***

### **3.3.1 Design Methodology**

Especially in the earliest phases of the design process, the project appears to have involved limited participation from the broad constituency of stakeholders concerned with biodiversity conservation. Although it has been difficult to determine where and when decisions about the design's essential structure were made, they seem to have been based on input from a limited number of USAID, World Bank, and GOB personnel. During the critical design period (from 1992 to early 1994), designers of the GEF project failed to take advantage of the participatory process followed in developing the NBDCS. By the time the scope of work for the PPA/SECA design study was prepared, basic decisions to focus the project strongly on MEW capacity-building, on protected areas management, and on two recently created national parks had already been made.

The World Bank then provided PPA funding to MEW, which competitively awarded a contract for development of a project design document to SECA. This was initiated after the NBDCS workshop and completed as the NBDCS was published (May 1994). USAID then went on to prepare the RFP, ignoring much of the detail of the SECA design but retaining such elements as budget divisions, LOE, procurement, and travel. The NBDCS, as both a process and a product, was poorly reflected in all these stages of project design, whereas it might have functioned as a blueprint. Much of the highly detailed and prescriptive content of the SECA design study was essentially a wasted effort.

### **3.3.2 Design Assumptions**

The original project design was predicated on a series of problematic assumptions. Moreover, these assumptions were not clearly expressed as such in the planning documents. In several cases, these assumptions reflect a misreading of existing conditions within Bulgaria. In other cases, they seem to reflect an evident desire to move ahead quickly on various components of the project activities despite potential obstacles. Most of the assumptions seem to have remained unwritten, and largely unchallenged, throughout the SECA design, preparation of the RFP and the MOU, and award of the contract.

- (1) The PPA/RFP design assumed that a new protected areas law, clarifying institutional mandates, could and would be enacted in a timely fashion. Draft protected area legislation had already been in circulation for several years as the project was being designed. There was no firm reason to believe that such legislation would be adopted quickly. Quick adoption was unrealistic given the complicated nature of such legislation, the strong forestry interests affected by the legislation, and the volatile state of national politics at the time. Indeed, by the time the MOU was signed, it was clear to both MEW and USAID that a new government was coming to power that would not be favorable to MEW having the mandate for protected areas management as foreseen in the draft Protected Areas Bill. USAID signed the MOU anyway and proceeded to award the contract several months later. Almost three years later, comprehensive new protected areas legislation has yet to be passed by Parliament. As this report is being prepared, the new leadership of MEW has just declared that passage of such legislation is among their highest priorities.



- (2) The PPA/RFP design assumed that the institutional commitments to, and responsibilities for, protected area management had been defined to a sufficient degree that the project could be efficiently implemented. The long-standing jurisdictional dispute between the former Committee of Forests (CoF) and Ministry of Environment over protected areas administration had never been a secret, and it has been the most significant obstacle facing the project during most of the life of the project. Although the Minister of MEW during the design phase favored the development of a clear mandate and institutional capacity for protected areas management within his ministry, subsequent ministers have been hesitant, or at least unclear, in their full support for assuming protected area responsibilities. On the other hand, opposition from the powerful CoF did not ease until early 1997. Yet, the project was designed with the development of institutional capacity for protected area management within MEW as its main focus, downplaying the highly problematic character of this issue.
- (3) The PPA/RFP design assumed that the National Service, with completely new institutional capacity for both managing individual protected areas and for administering Bulgaria's system of protected areas, could be both created and made sustainable within the project's three-year lifespan. The MOU, especially in its annexes, followed this assumption in developing a highly optimistic scenario for institutional strengthening of the National Service. Under the best of conditions, these may have been realistic plans. Given the unstable state of the political atmosphere and the inter-institutional conflict over the protected areas mandate, these plans, and the assumption upon which they were based, were highly questionable.
- (4) The PPA/RFP design assumed that the specified tasks could be completed under highly unpredictable and unstable socioeconomic and political conditions. Although several planning documents stressed the need for flexibility, the original RFP remained relatively prescriptive (in, for example, its specific focus on the two protected areas). Flexibility was not built into the design; it has been mandated, however, by the conditions and circumstances under which it has been implemented.

Because these largely unwritten assumptions have proven largely false, project managers have experienced substantial delays and have been unable to even begin implementation of significant components of the project.

### **3.3.3 Strategic Design Issues**

In addition to the design preparation issues described above, the final project design also entailed strategic features that have had long-term consequences for implementation.

#### **The Memorandum of Understanding**

The MOU signed in January 1995 served in effect as part of the project design. A key question one must ask was whether the project should have been initiated before important institutional issues were resolved. These issues included the level of commitment within the then Ministry of Environment, and the relationship between MEW and the former Committee of Forests which

wished to retain full jurisdiction over protected areas [at least the forested protected areas]. The MOU was clearly drafted under the assumption that the Protected Areas Bill that would have resolved these questions would have passed before the project was implemented. If the MOU was intended to provide resolution of these and other issues, one can only acknowledge that, in hindsight, it didn't.

The MOU, on the Bulgarian side, was signed by the MEW following approval by the GOB Council of Ministers. By the time the MOU was signed, the signatories were aware that the government would soon change and that the new government would be opposed to a MEW mandate for protected areas management. Difficulties in implementing the MOU could have been easily anticipated. Finally, the MOU annexes, providing operational direction, were overly prescriptive and unrealistic, and were not based on any coherent analysis of needs, conditions, and commitments.

### **Choice of Implementing Agencies**

The choice of the MEW as the lead implementing agency was made at the very beginning of the design process and was based on the assumption that it could develop a strong and coherent institutional structure for national biodiversity conservation policy, and that it would have a clear mandate as the sole juridical body responsible for management of protected areas. Progress in the project was thus tied closely to the fate of this particular agency, narrowing the options for effective allotment of project resources. Moreover, the essentially exclusive choice of this close partnership with MEW may have only reinforced the antagonism of the CoF at the time. The design also provided little role for NGOs, in contrast both to the usual practice of USAID projects as well as the precedent established during preparation of the NBDCS. The design, in effect, based everything on the creation of the National Service within MEW. The National Service, as envisaged in the design, has never been created and the project has had only limited flexibility to further the purpose and objectives of the project in its absence.

### **Focus on Protected Areas Component**

From the earliest point of its development, the project was focused mainly on protected areas management, to the general exclusion of other important biodiversity conservation issues. At the same time, the design documents contain no well developed statement of rationale, outlining the role that national parks and other protected areas would play within a comprehensive biodiversity conservation program. Other important responsibilities of the MEW in biodiversity conservation, such as the mandates and activities of the REI biodiversity and forestry officers, received little attention. The net effect of the strong focus on protected areas was that project progress hinged, to a significant extent, on the relationship between the CoF and the MEW. As noted elsewhere in this report, this relationship was, and remains, a central issue. But it was unwise to design the project in such a way that its success would require such a large investment of time in the clarification of that relationship, to the exclusion or neglect of the many other issues upon which greater momentum might have been built.

## Choice of Pilot National Parks

From the beginning, the TOR for the PPA mandated attention to Rila and Central Balkans National Parks. There is no doubt that these parks are of critical importance to the conservation of biodiversity, and well deserving of increased attention and planning. Nevertheless, there is some question as to whether the long-term goals of the project were best served by this decision, and the process followed in making it. In the context of this project, the two parks were chosen to serve as pilot projects for management planning within the national protected areas network as a whole, yet they offer relatively narrow opportunities for comparison. They protect roughly similar types of ecosystems (i.e., mostly montane forests plus highland meadows and sub-alpine and alpine types), and have similar institutional needs and problems, particularly those related to overlapping jurisdictions with the former CoF. The human pressures on these two parks are not particularly strong.

A broader approach to the choice of pilot protected areas, with clearly defined characteristics, objectives, and criteria, might have provided a smoother path to success in this task. A wider range of opportunities and lessons might have been gained if a protected area in a different region (e.g., the Rhodopes, Strandzha Mountain, Dobrudzha) or in a different ecotype (wetlands, steppe, coastal sand dunes) had been chosen. Such a site could have taken some of the attention off the tension in the MEW/CoF relationship, and allowed greater attention to be focused on strengthening the NNPS; provided a better chance of earlier and clearer results; provided better opportunities for comparison of protected areas management planning; provided better “coverage” of key biogeographic areas; offered a better sense of regional variation in the institutional challenges of protected area management; and yielded greater opportunities to define the distinctive role of the National Service in national biodiversity conservation policy.

### 3.4 Design Strengths

Although this section has focused on apparent weaknesses in the project design, it should be noted that the original design also entailed important strengths that allowed it to adapt to changing circumstances and to make substantial contributions to biodiversity conservation. These strengths include:

- ***Timeliness of investment:*** The project provided immediate follow-up to the NBDACS process, and was designed to foster near-term results. It has served to bring attention to important issues, especially protected area management, that were previously neglected.
- ***Budgetary flexibility:*** The project has only three budgetary line items. This has made it relatively easy for the project to operate under unforeseen circumstances and to adjust resources as needed.
- ***Financial mechanisms component:*** The explicit attention to financial mechanisms as a priority project task is especially important as the government ministries seek to maximize the impact of their limited funds.

- ***Training programs:*** The design's strong emphasis on basic training programs is especially appropriate and necessary, and will have continuing benefits for biodiversity conservation within the country.

### **3.5 Summary**

The next chapter will describe in detail the problems encountered in the course of project implementation. Most of the principal problems are rooted directly in the false assumptions and strategic errors made during the design phase. Although the World Bank was a key actor in the design process, USAID was involved from the beginning and is fully responsible for the RFP and the MOU. The project is a USAID/Washington initiative under the responsibility of their ENI/EEUD/ENR office. The ENR staff for Bulgaria during the design phase were directly responsible for design strengths and weaknesses.

In the Evaluation Team's judgment, the most critical shortcomings in the design process were:

- failure to incorporate the product and process of the NBDCS into project design;
- limited participation during the early stages of the design process in the most basic decisions affecting the project design;
- failure to require that design assumptions be made explicit and subject to peer review and monitoring; and
- limited involvement of professionals with broad training and experience in natural resources management in the design process.



## 4.0 Evaluation of Project Implementation

---

### 4.1 Historical Summary of Project Implementation

Table 2 presents the key historical events that have taken place since USAID awarded the project to ARD, Inc. in July 1995. This includes both events that are directly related to the project and, in a separate column, political and economic developments that are essential for a better understanding of the project-related events.

A new, pro-socialist government was elected the month after the project MOU was signed and before the contract was awarded to ARD. The new government sided with CoF on the long-standing conflict with MEW over the institutional mandate for protected areas management. Coincident with the arrival of ARD's COP in August 1995, the GOB let it be known, albeit unofficially, that they wished to transfer authority for protected areas management, **and the project**, to CoF.

USAID and the other donors active in this sector reacted strongly and unanimously against this proposal. A stop work order was eventually issued by USAID and project start-up was effectively delayed for half a year (ARD's COP returned to ARD's headquarters). The GOB eventually decided that they must honor the MOU that they had signed and that the project would remain with MEW. The project effectively began with the permanent arrival of the COP in February 1996. A new USAID project officer (COTR) replaced the COTR who had overseen the design phase shortly thereafter. CoF remained a very "reluctant" partner, however, and walked out of the first annual work planning workshop in May 1996 creating another crisis. Most project activities were suspended for the next three months. A formal project suspension was narrowly averted in August 1996 with the signature of a tripartite letter of agreement among MEW, CoF, and USAID.

At this point MEW finally began the creation of park-level bodies, but MEW did not create the institutional structure for a National Nature Protection Service as envisaged in the project design. The Protected Areas Bill was not enacted, nor has there been any attempt to do so during the life of the project. The Project Steering Committee (PSC) was finally formed in late November 1996, but relations between MEW and CoF deteriorated very badly once again. In spite of these problems, the project began an intense period of activity in support of the early stages of park management planning at the two pilot national parks and in support of the human resources development of the staff of the new MEW park-level bodies.

**Table 2: Events Following Contract Award**

Date	Project Related Event	Political Event
<b>1995</b>		New 'Socialist' Government Period of reduced emphasis on the rule of law in all spheres of society's life - mafiotic structures developed, increasing crimes, corruption; declining credibility of the state authority
July 26-28th	ARD's CoP consults with USAID's COTR in Washington, DC	
August 13-31st	CoP in Sofia; project start-up delayed	
September 14th	Contract Amendment No 1 issued, exercising option period	
October	Pan-European Ministerial Conference on the Environment	
October	Independent review team, prepares independent assessment; recommends protected areas management in MoE	
November 30th	Contract Amendment No 2 issued, adding "Stop Work Order" clause, and 30 day Stop Work Order issued beginning of December	
December	GoB recognizes MoU as a bilateral accord-agrees to keep project in MoE	
<b>1996</b>		Unprecedented event in the country's history bread crisis
January 17th	Minister of Environment requests that USAID restart project activities following GoB deliberations, USAID agrees	
January 17-18th	ARD's CoP consults with USAID's COTR and Contract Specialist in Washington, DC	
February 8th	CoP arrives in Sofia permanently to start-up project activities	
February 15th	CoF establishes Park Management Units for Central Balkan and Rila NP (about 7 others have since been established)	
February 27th	CoF presentation of proposals for development of project for management of forested parts of Central Balkan National Park	
March 3-9th	COTR visit and hand-over; donor meetings; preliminary development of OAR country-level indicators for GEF	
March 26 - April 5 <sup>th</sup>	ARD home office project management consultancy	
April 3-10th	Sub-contractor RESOLVE conducts MoE/CoF "Boyana Conflict Resolution Workshop" (6-8 April); results ; CoF remains "partner"	Banking system Collapses
April 28 - May 24th	First "Parks management" consultancy	
May 2-3rd	Project visit to environs of Rila National Park	
May 5-18th	COTR visit; project management issues, refinement of OAR indicators for GEF	
May 7-8th	Project visit to environs of Central Balkan National Park	
May 13-17th	First Annual Work Planning Workshop - CoF "walks out"	Hyperinflation
May 17th	Most project activities stopped upon USAID request pending agreement over compliance with MoU and collaboration with CoF	
June 1st – August	Drafting of 1st Year Work Plan; information dissemination; discussions over future of project	

Date	Project Related Event	Political Event
June	MoE completed preparation of an Order to establish National Park Inspectorates for five NP, including Rila and Central Balkan, expecting to satisfy a vital element of MoU.	
June 25th	Meeting of Parliamentary Commission for informal discussions between MoE and CoF concerning the project	
July 9th	PMU meeting with CoF at latter's invitation - idea for tripartite agreement developed	
July 29 - August 3rd	COTR visit to Sofia with Contract Specialist; resolution of project future, management and contract issues	Major collapse of the economy
August 1st	Signing of MoE/CoF/USAID Letter of Agreement; project continues	
September	MoE Park Inspectorates established; Information Education, and Communication Strategy developed	
November	Project Steering Committee established	New UDF president elected  'Socialist' government resigned, growing opposition prevents formation of a new one
December	Legal analyses begun on the protected areas issues; Training Needs Assessment begun	
1997		Strong public and political opposition led to simultaneous Constitutional, political and economical crisis, parliament dissolved and new elections scheduled. Interim government Nominated by the president - new minister of MoE and new Head of CoF
January - February	Ecotourism consultant mission, Sheppard Robson International (26.01. - 16.02.)	
April	Legal Seminar, Sofia	new government, new minister of MoE, CoF becomes department of the Ministry of Agriculture, Forests and Agrarian Reform
April 2-21st	Training Plan consultancy from the Home Office Project Management	
May	National Park Management consultancy Financial mechanisms consultancy (19.05. -04.06.)	
June	Consultant for management planning workshop arrived Management Workshop, Boyana (8-10 <sup>th</sup> )	
July	Annual Review and Planning Workshop (9-10 <sup>th</sup> ) Mid-Term Evaluation Mission (19.06. -18.07.)	



By the beginning of 1997, the project was overtaken by major political and economic changes in the country. A major economic collapse that began in mid-1996 contributed to growing political unrest that culminated in January/February of this year. An interim, “caretaker” government was formed, and new Parliamentary elections were scheduled and held in April. A new government was formed and the Ministry of the Environment became the Ministry of Environment and Waters. CoF became part of the new Ministry of Agriculture, Forestry and Agrarian Reform (MAFAR). Despite several written invitations/requests for meetings, the project had almost no formal contacts with the leadership of MEW at the Minister/Deputy Minister level from February until the Evaluation Team gave the new Minister a formal briefing of their findings and recommendations in July.

Upon their arrival, the Evaluation Team found that the long-standing CoF opposition to the MEW mandate for protected areas management had suddenly disappeared at the highest level with the new leadership in Forestry. There is probably a better opportunity now than has ever existed for forming a true partnership between the two ministries for protected areas management. What remained unclear throughout the duration of the evaluation is what the policies of the MEW will be on protected areas management and on the GOB commitments made under the Project’s MOU for the creation of a coherent institutional structure for biodiversity conservation and protected areas management under the umbrella of MEW.

## **4.2 Overall Progress Toward Achievement of Project Objectives**

The Evaluation Team was told that the GEF Project SOW is the basic document against which to evaluate project implementation. As seen in Section 2.2, the presentation of project purpose, objectives and tasks in the SOW are sometimes unclear and confusing. The Evaluation Team has paraphrased some of the four project objectives from this SOW as indicated below, using, especially, the results framework as the best guide as to how the objectives have been interpreted by those implementing the project. Key findings in this section are highlighted in bold.

### **4.2.1 Objective 1: Institutional Support for MEW and its Partners**

#### **Statement of Objective 1**

The first objective is paraphrased as follows:

*The project will provide support for increasing the institutional capacity of MEW and its partner institutions to assure biodiversity conservation in Bulgaria in general and for creating new institutional capacity for protected areas management.*

The project design explains that project support to MEW was to be focused on a new institution that the GOB was to create within, or under the umbrella of, MEW. This new institution was to be called the National Nature Protection Service. It was to be a single institution composed of a national headquarters, park directorates in the field, and biodiversity units in the regions. To establish this new institution, the MOU obligated the government to add 183 new civil service

positions at the national, park, and regional levels. The project was to support institutional development of the new service at all three levels.

Recall that the project was designed under the key assumption that the Protected Areas Bill would have been passed by the time the project started. This legislation would have clearly defined the MEW's mandates and structures for biodiversity conservation and protected areas management. In the absence of this needed legislation, an internal MEW administrative order (Order RD-45 signed and dated 01-08-1994) establishing the National Nature Protection Service was issued by the same Minister who signed the MOU with the U.S. government. Order RD-45 defines the mandates and structures of the NNPS in full compliance with the MOU (and the draft PA Bill) and the project design. This administrative order had not yet been put into effect at the time of the signing of the MOU, nor at the time of project start-up.

## **Findings**

In many ways, project support for this first objective has scarcely begun. There is one key finding that is far more important than all the others:

**The principal institution whose development the project is supposed to support has not been created by the GOB/MEW.**

The reader must pay close attention at this point because the institutional names and acronyms are confusing. The new institution that was to be created was to be called the National Nature Protection Service. There is actually a department within MEW that is called the National Nature Protection Service (NNPS), but it is not the institution that was to be created as defined in the project design, the Administrative Order RD-45, or the MOU between GOB and USAID. The existing NNPS is a department within the ministry that was created by changing the name of a pre-existing department. In this report, this existing department is called the NNPS, and the institution that was supposed to have been created is referred to as the National Service.

Other key findings concerning the GOB's institutional reforms in support of Objective 1 are the following:

- **Although it appears that it has never been formally rescinded, Administrative Order RD-45 creating the National Service was never implemented.**
- **The Protected Areas Bill has not been passed, nor has there been any significant attempt by the MEW to achieve its passage during the life of the project** (MEW declared during the course of the evaluation that they have fixed passage of new protected areas legislation as one of their new priorities.)
- **The existing NNPS has not been given a mandate for protected area management by GOB/MEW.** It has not been given responsibility for directing and administering the network of protected areas in Bulgaria, nor has any other body (although, during most of the life of the Project, Forestry has maintained that this should be their function).

- **Five park-level bodies were created by MEW in late 1996** (one year later than called for in the MOU), including two for the pilot protected areas of Rila and Central Balkans National Parks. Initially called Park Inspectorates, they have recently been put under the administrative control of MEW bodies that have nothing to do with PA management. **Their institutional status and mandates are very unclear.** (For this reason, they are referred to as park-level bodies.) They have never been park directorates as specified in the MOU. **MEW has never made it clear that their park-level bodies will have direct management responsibility over protected areas.**
- **The existing NNPS has no hierarchical control over the park-level bodies. There is no system of PA management within MEW.** (The traditional role of MEW is one of control, not of management.)
- **NNPS has no hierarchical control over the biodiversity officers in the REIs. There is no overall functional structure for biodiversity conservation or protected area management within the MEW.**
- **MEW has added no new staff to NNPS or the Regional Environmental Inspectorates (REIs).** Of the 183 new positions to be created as specified in the MOU, **approximately 23 new staff positions were created, all of them in the five new, park-level bodies. Most of these positions are staffed by individuals under short-term contracts (one or two months.)**

What exists at the time of the evaluation are just pieces of what could still become the National Service. The present NNPS could be transformed into the headquarters of the National Service, but its present institutional status is far from that of the semi-autonomous institution foreseen in the project design. Mandate and capacity for management of Bulgaria's system of protected areas would have to be added to the NNPS. The park-level bodies could easily become the park directorates of the National Service. The biodiversity and forestry officers in the REIs could become the regional biodiversity conservation units of the National Service.

In the absence of a coherent National Service, the Evaluation Team analyzed the success of the project in providing institutional support for these individual components. The emphasis here is on support to the NNPS and to the biodiversity/forestry officers of the REIs, because support to the park-level bodies and their partners is a principal component of Objective 2. Key findings are the following:

- **Very little project support has been targeted directly at either the NNPS or the REI biodiversity/forestry officers. There has been no institutional assessment of the NNPS/REI and there is no project strategy for supporting their institutional capacity for biodiversity conservation. There are no established counterpart relationships between PMU staff and NNPS staff.**

- **The project has had relatively minor impact on the structure, functions, and capacity of the NNPS and the REIs to assure biodiversity conservation in Bulgaria and has produced no institutional structure for management of the network of protected areas in Bulgaria.**

Both NNPS staff and the biodiversity and forestry officers at the REIs have biodiversity conservation functions. Project support should have been directed to the Ministry to increase the capacity of NNPS and the REIs to promote all aspects of biodiversity conservation in Bulgaria. The ARD team has argued that such support should begin with an overall institutional assessment of NNPS's and the REI officers' present mandates, functions, structures, and staff. The Evaluation Team agrees that such an assessment should be the logical basis for planning the project's institutional support in this area.

ARD's Senior Resident Advisor reported that he recommended several times to the former NNPS Director (who was removed from this position during the evaluation) that the institutional assessment be done. The former director initially chose not to undertake such an institutional assessment, reportedly because of reluctance to deal with personality conflicts that existed within the NNPS. MEW leadership should have been involved in such a decision, but there has been no functional relationship between the PMU and the Ministry above the level of the NNPS during much of the life of the project, especially since early this year when this issue became more acute.

In the absence of an institutional assessment and a subsequent strategy for institutional capacity building, almost none of the project support to NNPS or the REIs have been specifically targeted on these two bodies. While no training activities have been designed for NNPS or the REI biodiversity officers, many of the NNPS staff and biodiversity officers have been invited to attend workshops put on by the project. Most of these workshops have been developed in support of PA management. Many REI biodiversity staff have attended such workshops; participation by NNPS staff has been much more spotty.

Another way that the project could have provided support to the NNPS would have been the development of formal counterpart relationships between PMU and NNPS professional staff. The vast majority of the PMU's contacts have been with just two of the NNPS staff including the former Director. ARD's Senior Resident Advisor first informally suggested that counterparts be designated, then in a letter to the NNPS Director in March 1997. The director did not accept this proposal. The SRA then further suggested that the project hire an administrative and Liaison Assistant who would be an ARD employee working under the day-to-day supervision of the NNPS Director. The assistant would assure information flows between the PMU and NNPS, and would assist with secretarial/administrative duties at NNPS (NNPS has no such support staff whatsoever). NNPS had not formally responded to this, the main stated constraint being lack of office space at NNPS for such an assistant.

The physical location of the PMU is a contributing factor, being located several blocks away from MEW/NNPS. This has been a distinct advantage for the project during the major institutional conflicts between CoF and MEW, because it minimized the perception that the PMU

was a MEW “organ.” On the other hand, its physical location greatly reduces the type of daily contact that would take place if the PMU had been in the same building with NNPS. It may also reduce the feeling on the part of MEW staff that this is “their” project.

The failure of MEW to create the National Service, to agree to an overall institutional assessment for the NNPS and REI biodiversity conservation functions, and to designate formal counterparts for the project staff is not the responsibility of the Contractor. However, the Evaluation Team feels that the PMU staff could have been more forceful in bringing these issues to the attention of USAID and the leadership of the Ministry. One of the main vehicles for doing this would normally be the Contractor’s quarterly reports. For example, one does not find these issues addressed in the Fourth Quarterly Report for March to May of 1997, which was prepared with a new government coming to power and with the mid-term evaluation in preparation.

A very significant accomplishment of the GEF Project that can serve as a basis for future institutional strengthening and for legislative reform has been a comprehensive legal review. It includes a review of the legal framework for biodiversity conservation and protected areas management, the mandates of institutions concerned, and the legal basis for such terms as protected areas management. Although the interpretation of existing laws generally supports the legal authority of MEW for protected areas management, the review also highlights strongly the inadequacies and contradictions of the existing legislative framework.

#### **Overall Progress on MEW Institutional Strengthening**

Overall progress has been very marginal. The major impediment has been the GOB’s failure to create a coherent institutional structure for biodiversity conservation and protected areas management. The greatest single gap in the existing framework is the absence of any institutional structure with a mandate for the administration/management of Bulgaria’s network of protected areas. The MEW has not allowed the GEF Project to conduct an institutional assessment of their biodiversity conservation functions and, consequently, the project lacks any strategy for increasing their capacity to do this. There has been little impact on the NNPS and the REIs in terms of their institutional structure, functions and capacity for biodiversity conservation. The lowest impact has probably been on the existing NNPS.

#### **4.2.2 Objective 2: Pilot Development of Protected Areas Management**

##### **Statement of Objective**

Section 2.0 of the GEF Biodiversity Project Scope of Work describes the second principal project objective as follows:

*[The project will] develop protected area management planning and implementation processes, and demonstrate park development through site specific management programs. This includes a review of past experience for protected areas and development of management plans for the Central Balkans National Park (building upon work already initiated by USAID) and Rila National Park.*

Section 4.3 of the SOW states: *“The contractor will assist the MEW/NNPS to develop management plans and demonstrate interagency collaboration in plan implementation for the Central Balkans and Rila National Parks.”* The SOW characterizes this task as *“the core field activity of the GEF project.”*

The overall objective of the task is *“to provide models for the development and implementation of comprehensive management plan.”* Subsidiary objectives described in the SOW relate to establishment of on-site management structures; development of trained park professionals; demonstration of interagency cooperation and public-private partnerships; protection and restoration of biological features; sustainable use of natural resources in and around the parks; and development of sustainable tourism, public awareness, education research, and monitoring programs.

## **Findings**

Most work on this objective began a full year late because of delays resulting from the major conflicts between MEW and CoF over which institution should have the mandate for protected areas management, at least over management of forested protected areas. The intergovernmental MOU did not resolve this long-standing conflict between these two institutions. Progress on Objective 2 is dependent upon a close collaboration between MEW and CoF. Until early 1996, the powerful Committee of Forests has either openly opposed or, at best, has been a most reluctant partner for, protected areas management. This conflict was the principal factor blocking and delaying project implementation during the first year of the project.

The basis of this conflict is rooted in legislation, land tenure, and institutional precedents. The legal review conducted by the project has clearly demonstrated the nebulous, often contradictory legal mandates for protected areas management. CoF could and did point to elements of existing legislation that supports their claims. Also, most protected areas are forested and these forested lands are classified as Forest Fund lands. CoF has management responsibility over Forest Fund lands. The legislation is very unclear over management responsibility for Forestry Fund lands within protected areas. Furthermore, CoF does have some tradition of protected area management at Pirin National Park.

The PMU staff, the new USAID COTR and the USAID/OAR recognized from the beginning that the conflict between the two institutions had to be resolved, and they made significant efforts to do this. A project-sponsored, professionally facilitated conflict resolution workshop between MEW and CoF was organized in April 1996, but CoF “walked out” of the annual work planning workshop the following month. The PMU staff successfully maintained a dialogue with both CoF and MEW throughout and were instrumental in drafting and negotiating the “tripartite letter of agreement” that was signed in August 1996. This did not resolve the basic conflict, but it at least led to the creation of park-level bodies by the MEW in September 1996. Initially called “park inspectorates,” their establishment finally provided the basis upon which the project could begin significant work toward implementation of this second objective:

Key findings of the Evaluation Team concerning Objective 2 start with the following:

- **Separate park management bodies for the two pilot parks (and about seven others) were created by the Committee of Forests in early 1996, using their own resources and well before MEW created theirs. At the time of the evaluation, these parallel management bodies were working under separate hierarchical structures and had no effective collaboration with each other.**
- **The Team found that the staff of these parallel management units have very different perspectives as to the purpose and objectives of these two pilot parks and what types of use should be permitted in the parks. Forestry's staff favor a much higher level of commercial and extractive use of the parks including significant levels of timber harvest.**
- **This situation is unworkable and ultimately cannot succeed.**

The differences between these two agencies extend beyond jurisdictional and operational issues, to highly divergent views concerning the role and purpose of protected areas in general, especially of the national parks. The CoF was opposed to the creation of these national parks. Most foresters view the national parks as “People’s parks” serving human resource needs above and beyond their biodiversity protection functions. MEW personnel tend to see the pilot national parks in their role as IUCN Category II protected areas, playing an essential role in biodiversity conservation. These fundamental differences in the sense of the purposes and goals of national parks lead to divergent views on appropriate uses and management actions, and obviously to different conclusions regarding appropriate institutional roles of MEW and CoF in the management of these areas.

The CoF and MEW park-level bodies are engaged in parallel, uncoordinated protected area planning processes. The result is duplication and waste, and the likelihood that the resulting plans will have conflicting objectives and strategies. The Evaluation Team concurs in the conclusion of the Protected Areas Management Planning Consultant Team that *“this situation is unworkable and ultimately cannot succeed.”* This situation is a hold-over from the long-standing conflict between CoF and MEW. It is clear that the new leadership in Forestry is disposed toward a favorable resolution of this conflict. However, at the time of the evaluation, the changes at the top had not percolated down to the bottom.

Since the fall of 1996, the Objective 2 component has become, and remains, the “core field activity” of the project. Programmatic support for pilot protected areas management undertaken by the project can be grouped into three inter-related areas. The first has consisted of workshops and training events for those who will manage the parks, i.e., the staff of MEW’s park-level bodies and their actual or potential collaborators (training is given separate treatment in Section 4.2.5). The second area has involved the hiring of large numbers of local consultants (about 70 of them) working in teams to gather and synthesize background information as the first stage in the development of management plans for the two pilot parks. The third area has consisted of a

number of international consultant missions on a range of topics concerning protected areas management.

The Evaluation Team's main findings on the pilot protected areas management component are the following:

- **The project has made good progress in increasing the general understanding of the modern concept of protected areas management, a concept that was not at all well understood in Bulgaria.**
- **The Team approves of the fact that the project has sought to help develop a “Bulgarian model” of protected areas management and has not sought to impose an American or other model.**
- **The sheer volume of the programmatic activities carried out since last November is very impressive.**
- **The programmatic activities in support of protected areas management have generally been appropriate, balanced, and well thought out.**
- **The Evaluation Team approves of the strong use of local consultants.**
- **MEW's park-level bodies at Rila and Central Balkans have established very active outreach programs to involve developing partnerships with local NGOs, museums, municipalities, and others. Everyone the Team met with were very positive about this collaboration and hopes that it would continue to develop.**
- **The staff of MEW's park-level bodies at Rila and Central Balkans are anxious to make use of their new skills in the field and in the local villages, but they are frustrated by lack of means of transportation or of any realistic operational budget that would allow them to do so.**

The staff at Rila and Central Balkans reached a maximum total of 15 this year. Under the new government's program of reduction in the size of the civil service, this was reduced to 11 during the evaluation. Of the 11, only 4 are civil servants. The other 7 are on short-term, one- or two-month contracts. At the time the Team visited Central Balkans, the staff's contracts had expired and they did not know if they would be renewed (they were renewed for another two months). The Minister of MEW informed the Team that further layoffs would be coming soon.

Staff are eager to make use of their new skills from the training they have received, but are frustrated with their inability to go out into the park or the towns around the park. The project has provided office equipment, but the park-level bodies have only a “symbolic” budget for operating expenses that does not cover operating costs of the office equipment. They occupy rented office space and they have no vehicles for transportation.



Important progress has also been made in gathering the basic scientific information upon which full management plans can be based. Extensive studies of the biodiversity of Rila and Central Balkans National Parks have been completed during the first phase of research. **The team recognizes, however, that greater attention may need to be given to certain issues involving the role of science in protected area management and planning. These issues include, in particular:**

- **the need for better basic definition and understanding of the role of science in protected area management;**
- **the need for a clear definition of protected area management information requirements that can be shared by scientists and managers alike;**
- **a stronger understanding of the linkages between field studies and protected area management; and**
- **extensive spatial analysis of biological features, research priorities, and analysis of threats.**

The GEF-sponsored workshop on Protected Areas Management Planning, held at Bankya on 8-10 June 1997, was a key step in addressing these issues, and provides a promising start for further attention to these needs.

#### **Overall Progress on Pilot Management Planning**

**The Team sees project progress in meeting this objective as very significant but extremely tenuous. A most significant achievement is the increasingly broad acceptance of the concept and process of management plan development by all players involved in protected areas management in the country.**

**The technical approach and results of the project are basically very sound. It is the institutional commitment of the MEW that is lacking. MEW's park-level bodies have no clear institutional status and no clear mandate for protected areas management. They are not part of a coherent institutional structure for protected areas management in Bulgaria.**

**The staff of the park-level bodies have no means of transportation and no meaningful operational budget. The bulk of project resources have been focused on protected area management planning and on training of the park-level staff who should form the core staff implementing the management plans. The focus of this \$4 million project to date has been on a group of 11 people with little job security, most of whom are on one- or two-month contracts.**

#### **4.2.3 Objective 3: Development of Alternative Financial Mechanisms for PA Management**

##### **Statement of Objective**

Section 2.0 of the GEF Biodiversity Project Scope of Work describes this project component as follows:

*[The project will] develop financial mechanisms (i.e., nature tax and user fees) to fund a self-sustaining protected area program.*

The task is described in greater detail in Section 4.2 of the SOW under the heading “Financial Mechanisms”: *“The contractor will... develop and apply legal and financial instruments (i.e., nature tax and user fees) to solidify MEW/NNPS authority and augment state budgetary resources for protection of biodiversity.”* The team notes that this represents a somewhat narrower scope of activity, and this is further restricted in the ensuing direction to the contractor to *“assist with the development of new financial mechanisms to fund a self-sustaining protected areas program under the NNPS.”* In effect, this task is subsumed under the project’s main focus on protected area planning and management. The SOW assigns supporting subtasks: to *“develop and implement a training program”* and to provide technical assistance *“to develop and implement a revenue generation program.”*

##### **Findings**

The main activity carried out under this task was the preparation of the report “Financial Mechanisms for Biodiversity Conservation and Protected Area Development”, just issued in June 1997. This report examines the existing conservation financing situation; describes the “off budget” accounts available at the national level for environmental protection in Bulgaria; describes existing donor funding programs for conservation; considers the potential of various conservation financing options (including increased national and international support, user fees, debt-for-nature swaps, park entry fees, and tourism and other commercial enterprises); and provides recommendations for further steps involving a conservation financing workshop, consultancies, and personnel.

This report had just been issued prior to the mid-term assessment, and so had not yet been acted upon further under the project. At the same time, the rapidly changing in-country economic conditions, and especially the new Currency Board policies, may affect some of the options and opportunities outlined in the report. An addendum to the report may be called for. The team sees the recommended workshop on conservation financing as a useful and important next step. Based on our discussions, we hope this workshop will offer further opportunities to explore in greater detail the options identified in the report (especially the potential for development of conservation trust funds).

## Overall Progress on Financial Mechanisms

So far, little attention has been devoted to this task as compared with the major investments of time and effort that had to be given to other priorities in implementing the project. **The Evaluation Team sees the progress in meeting this task as moderate.** The level of attention was appropriate under the circumstances, and greater attention to this component can be expected if the key issues affecting the project as a whole can be resolved.

### 4.2.4 Objective 4: Procurement of Equipment for the Pilot National Parks

#### Statement of Objective

Section 2.0 of ARD's SOW states:

[the Project will] *“provide equipment for the management of the Central Balkans and Rila National Parks (vehicles, communications equipment, audio-visual equipment, signs, fencing, etc.).”*

The SOW further states *“The Contractor will identify and provide equipment for the management....”* of the two parks. *“The total cost shall not exceed \$800,000.”* An illustrative list of equipment includes *“approximately 30 [all-terrain] vehicles.”*

#### Findings

No procurement was done prior to the creation of MEW's two park-level bodies in late 1996. Since then, the project has supplied basic office equipment for each office. This consists primarily of two computers, a printer, a photocopier, and a fax machine for each office. **This equipment seems to be of appropriate type and quality, and procurement seems to have been done in an efficient fashion.** On common agreement between the PMU and USAID, all other procurement has been postponed pending resolution of the unfulfilled commitments of the GOB under the intergovernmental MOU that governs the project, particularly those concerning the creation of the internal institutional structure for biodiversity conservation and protected areas management as foreseen in the project design. The Evaluation Team considers this suspension of procurement to be appropriate. It would be most unwise to proceed with procurement in the absence of any coherent institutional structure for park management.

#### Overall Progress on Equipment Procurement for Park Management

**Progress has been marginal. However, this is no fault of the Contractor. Suspension of procurement was a project management decision made because of unfulfilled commitments for institutional reforms on the part of the GOB.**

#### **4.2.5 Progress on Intermediate Objective A.4**

As stated in Section 2.2., Intermediate Objective A.4 lies somewhat outside of the original four objectives of the project. Intermediate Objective A.4 is stated as follows:

*Improved understanding and support for biodiversity conservation nationally and internationally.*

The second annual work planning workshop conducted near the end of the Evaluation Team's stay strongly confirmed the need for improved understanding and support, and encouraged the project to heighten their "lobbying" efforts to enhance support. This Intermediate Objective has been a relatively non-controversial objective on which the project has been able to devote a lot of effort despite the institutional conflicts and other problems that have restrained the project in other areas. The Evaluation Team believes that project efforts toward increasing understanding and support for biodiversity conservation have been appropriate activities for the project.

The project has developed an Information, Education and Communications Strategy to further this Intermediate Objective. A public opinion survey conducted by the project has shown that only about 5 percent of Bulgarians are concerned enough about environmental problems to seek information on these problems themselves. An analysis of 1,000 articles in the press has shown that few reporters are specialized in this area and that coherent strategies for reporting on environmental problems are lacking.

The project has a program of weekly press releases on behalf of MEW. Work on a "Nature Protection Booklet" is advancing. An analysis of school program curricula and materials is underway and recommendations for improvement are being prepared. A conservation education task force has been created to develop an action plan for the development of curriculum materials and of school surveys at the park level.

It was not possible for the Evaluation Team to evaluate the effectiveness or the impact of work on Intermediate Objective A.4, but activities appear to be needed and well conceived, and implementation is advancing very well.

#### **4.2.6 Training**

The Project SOW has training as sub-tasks in support of three out of four of the project's objectives (only equipment procurement does not). According to the SOW, the Contractor shall develop the specific details of a fully integrated program of training and follow-on assistance that supports the institutional strengthening task. In accordance with this, numerous training activities have been planned and performed despite the serious difficulties and delays during the first year of the project. The PMU has a full-time Training Coordinator to handle these activities. The Evaluation Team chose to give training separate treatment from the four objectives because it is a category of activity that supports all the principal project objectives.

It should be mentioned that even before the real start of the project, the Office of Biodiversity, Protected areas and Forests (later NNPS) with the Ministry of Environment started some training

activities in order to prepare the key persons from both MEW and CoF for the project and the activities necessary for its normal development (see the Review chapter of the project design).

### **Training Needs Assessment and Training Strategy**

The project has devoted significant efforts to analyze the training needs and to develop an appropriate training strategy to further project objectives. First, a formal training needs assessment was conducted for the project by a Bulgarian consultant group between December 1996 and March 1997 with the goal to identify the training needs on the individual and organizational level of the Park Inspectorates for Central Balkans and Rila National Parks, of NNPS, and, to some extent, within CoF (Dimitrov et al., 1997. Training Needs Assessment Research Project, ARD - Bulgaria). Training needs were identified taking into consideration the specifics of the Bulgarian conditions and current needs in the field of the biodiversity conservation and protected areas management. The needs assessment was hampered by the “*..absence of guidelines, job descriptions and organizational structure within the National Nature Protection Service and the Regional Park Inspectorates..*” (Hetz and Georgieva, Training Strategy and Action Plan, May 1997)

The training strategy was developed under a TDY by a professional from ARD’s home office working with the PMU Training Coordinator. This strategy further highlights the lack of job descriptions; the lack of experience and understanding of what park management entails; the absence of a defined, Bulgaria-specific, protected areas management planning process; and the lack of a defined institutional framework for PA management. Although some of these constraints are unavoidable on a project that is intended to build this type of institutional capacity that does not yet exist, many of the constraints were due to the lack of institutional structure that was foreseen in the project design, but which has not yet been established by MEW. The Strategy remains strongly focused on protected areas management and does relatively little to address the other broad objective of building MEW’s capacity to support biodiversity conservation in general. Given the lack of institutional structure and the absence of an institutional assessment of this function, it is hardly feasible to include it in the training strategy.

The training strategy advocates contract mechanisms for implementing the training program through Bulgarian training groups. This seems very appropriate. The Evaluation Team finds that the training needs assessment and training strategy were done in a professional fashion. They did a very good job of recognizing the real constraints faced by the project and devised a good strategy within those constraints.

### **Quality of the Training**

Although the Evaluation was not able to focus strongly on the training that has been conducted, the Team did discuss training with the park-level staff who have been the principal focus of most of the training; this feedback was nearly all positive. The training workshops that were conducted have generally been appropriate and of high quality. One particularly important aspect of the project’s training has been its highly participative aspect involving stakeholders of diverse backgrounds. Formal training alternates with working sessions in which the participants attempt

to apply general principles to the Bulgarian context. In this aspect, the project has picked up on the highly participatory process that was begun during the preparation of the National Biological Diversity Conservation Strategy. The importance of this approach is critical in the East European context. These countries are just emerging from a “command structure” where people were rarely allowed, much less invited, to express and debate their views on different issues.

There has recently been some criticism from high levels in MEW that the training has not been practical enough. While the Evaluation Team understands the desire to move forward quickly and to see concrete results on the ground, the Team feels that the participatory process is critical to the success of the project and to Bulgaria’s conservation of its biodiversity. The training themes have included a range of “soft” skills including “Communications Skills,” “Public Participation in Park Management,” “Partnerships in Park Management,” and “Group Process Facilitation.” It is the Team’s impression that well-qualified Bulgarians can be recruited relatively easily in most of the “hard” technical skill areas. Bulgarians tend to have much less experience in the skills needed for participatory management processes, and this needs to be a focus of training. The project is not, and should not, be imposing a protected areas management model from the USA or somewhere else. The participatory process will serve to assist Bulgaria in developing its own “Bulgarian model” of protected areas management and biodiversity conservation.

### **4.3 Evaluation of Project Management**

#### **4.3.1 *Summary Description of Project Management***

USAID designed and manages this project out of Washington, DC. Their ENI/EEUD/ENR office has lead responsibility for project management. The Contracting Officer’s Technical Representative or COTR has direct responsibility for day-to-day management for USAID. Given the physical location of the COTR, this is mostly done by E-mail and telephone. The project has had two different COTRs—the first oversaw all of the design phase. The present COTR took over during the first few months of 1996 just after project implementation began. A large portion of the project files with the original design documents/history/correspondence, etc., were somehow lost in this handing-over process.

Responsibility for implementation of the project was awarded under competitive, international bids to ARD, Inc. in Burlington, Vermont. ARD’s responsibilities are defined in their contract with USAID signed July 11, 1995. ARD has fielded a single LTTA, their Senior Resident Advisor (SRA), and has created a Project Management Unit (PMU) housed in rented office space in Sofia. The SRA is ARD’s chief-of-party and head of the PMU.

USAID has no bilateral agreement with the Government of Bulgaria (GOB). The responsibilities of each party are defined in an inter-governmental MOU signed in January 1995. Key commitments of the GOB were the creation of a coherent institutional framework for biodiversity conservation and protected areas management, and the creation of a Project Steering Committee to provide high-level guidance for project development and to resolve major institutional

constraints to project advancement. The MEW/MEW is the lead implementing agency for the GOB.

#### **4.3.2 Evaluation of USAID's Management of this Project**

USAID/ENI/EEUD/ENR in Washington was responsible for project design. The Evaluation Team's findings on all the shortcomings of the design of this project are covered in Section 3. It is apparent that the false assumptions and strategic errors made in the project design and development reflect a lack of ENR development experience on the part of those responsible for the design.

At the beginning of 1994, USAID targeted November 1994 for the award of the contract for this project. However, the RFP was not released until September and proposals were submitted in December 1994. For reasons that are not fully clear, it took USAID until July 1995 to award the contract to ARD, Inc. It would appear that the proposal review process was not managed very efficiently by USAID.

USAID developed the intergovernmental MOU for the project over an extended period of about a year. The MOU, itself, was drafted under the unwritten assumption that the Protected Areas Bill would be passed, and it does not explicitly lay out the details of the institutional reforms that were essential if the project was to be successful. As a stand-alone document, it is poorly worded. In January 1995, USAID signed this MOU knowing that a new, pro-socialist government was coming into power and that the new government would be opposed to the conditions of the MOU. In hindsight, this decision to push forward knowing the new government would be opposed to basic elements of the project design seems to have been poor judgment.

The project design combined with the February 1995 change in government virtually guaranteed that project implementation would require close and frequent contact between USAID and the GOB. This, however, has been very difficult due to the physical location of the USAID project officer in Washington, DC. The key aspects of the actual relationship have been as follows:

- given the politically charged nature of the project and the frequent changes in government combined with her physical location and the limited number of working trips that have been possible, the COTR has found it very difficult to establish and maintain a good working relationship with the GOB;
- the Contractor has been drawn into a much greater role of diplomat/negotiator than is normally played by a contractor; and
- the OAR has been frequently drawn in to manage/resolve the recurring crises the project has lived through.

Although project management out of Washington is typical for USAID projects in this region, this strategy has not worked well for this project.

Given the circumstances, the three parties have done an admirable job in managing a very difficult situation. The OAR, in particular, has strongly supported this project and has played a critical role in intervening at high levels to attempt to resolve the conflict between MEW and CoF. However, it appears that the preoccupation with the conflict between the two institutions has perhaps distracted the attention of these parties away from the internal institutional reforms needed within the MEW.

As with all USAID projects, the COTR approves all major expenditures, including recruitment of STTA, workshops, equipment, and procurement. This process seems to work well, despite the physical separation. The present COTR initiated the use of the results framework into the project and oversaw a major contract modification.

The USAID Contracts Office has had a good relationship with the project. The major contract modification was accomplished a year ago with the COTR, ARD'S COP and a Contract Specialist sitting down together for several days in Sofia. All parties seem to have been quite pleased with this pragmatic approach. A high turnover rate in contract officers has caused some delays, particularly over PMU vehicle procurement.

USAID has obligated \$4 million dollars for this project. However, USAID's contract with ARD for project implementation is for \$4.23 million. This ambiguous situation has now gone on for well over two years without being addressed by USAID.

### ***4.3.3 Evaluation of ARD's Management of this Project***

#### **Timeliness of Project Start-up**

After long delays in contract award, ARD first fielded its COP one month after their contract was signed. Then, after the half-year delay, they fielded the same person within three weeks after USAID agreed to start the project. If ARD's candidate for COP had not come from their home office staff, it is highly unlikely that their original candidate would still have been available 14 months after their proposal was submitted. They then quickly proceeded to set up the PMU and were able to contract the same professional staff that they had originally proposed. The Evaluation Team feels that ARD did an exemplary job handling project start-up in a timely and efficient manner.

#### **Functioning of the PMU**

The PMU is one of the great strengths of the project. The Senior Resident Advisor has proven himself to be a well-qualified professional who also has the diplomatic skills needed to navigate successfully between two major government institutions in conflict. The evaluation team was also very impressed with the professionalism and dedication of the senior Bulgarian staff and with the endless good cheer and can-do attitude of the support staff. The PMU is a testament to the capabilities of the Bulgarian people when able to work in an open, participative setting that challenges each staff member to contribute their best in a team effort toward common objectives.



## **Fielding of STTA**

ARD has made much greater use of Bulgarian expertise for short-term technical assistance than was foreseen in the project design. This has been especially true for STTA needs in the biological sciences for protected areas management planning, for training, and for the analysis of the legislative base for biodiversity conservation. The Evaluation Team believes this has been totally appropriate. Bulgaria has exceptional human resources in many of the fields needed by the project and many of them are severely “underemployed” under the current economic situation.

## **Assessments/Strategies/Implementation Programs**

ARD has adopted a logical approach for moving forward in different sectors by first assessing what the needs are, then developing a sector strategy, and then a program for implementing the strategies.

## **Timeliness and Quality of Reporting**

Reporting seems to have been done in a timely fashion. Quarterly and annual reports are of good quality. Technical reports and assessments have been very well done.

## **Procurement of Equipment and Supplies**

Although relatively little procurement has been done other than office equipment, what has been done seems to be appropriate, of good quality, and was procured in a timely fashion. The project has ordered only one vehicle to date and this has sat in Bulgarian customs for a very long period of time awaiting paper work that only the MEW/GOB can provide.

## **Quality of Back-stopping by ARD/Burlington**

Backstopping is made relatively easy for this project by the fact that the COP is a permanent employee of ARD who went out from the home office and who knows exactly who to call on for assistance on a given topic. Nevertheless, ARD appears to have a much higher ratio of experienced professionals with technical backgrounds backstopping its projects from its home office staff than many similar firms, including the project manager directly responsible for backstopping this project. The quality of home office backstopping seems to be very good. The USAID project officer told the Team that the ARD home office has always been very timely in responding to her questions or requests.

## **Focus on Key Issues**

The Evaluation Team feels that the ARD/PMU Team could have played a stronger role in focusing the attention of USAID and the highest levels of the Ministry on the need for the MEW to create the internal institutional structure for biodiversity conservation and protected areas management that was called for in the project design and the MOU. The project is supposed to be supporting an institution that has not been created, and the failure of MEW to create the

National Service does not come through forcefully in the project reports. In a similar vein, the need for an overall institutional assessment of NNPS/REI biodiversity conservation functions and the subsequent development of strategies to support those functions (including the development of formal counterpart relationships with NNPS) should probably have been pushed harder by the ARD Team.

#### **4.3.4 *Role of GOB/MEW in Project Management***

The most basic responsibility of the GOB and the Ministry of Environment on this project was to create and staff the National Service as envisaged in the design, in the draft Protected Areas Bill, in the internal MEW administrative order of September 1994, and in the intergovernmental MOU. This National Service was the institution, with its functions of biodiversity conservation and protected areas management, that the project was intended to support. The MEW has not implemented its own September 1994 Administrative Order RD-45 entitled NNPS Regulations that would have created this National Service. Neither has MEW pushed for passage of the Protected Areas Bill that would have codified this structure into law and would have resolved the question of legal mandates for protected areas management. There is no coherent institutional framework in the Ministry for biodiversity conservation and protected areas management for the project to support.

Park-level bodies were created by MEW, but not until the fall of 1996, and most staff were not appointed until the beginning of 1997. Most of the staff remain contractual staff on one-to-two-month contracts. The park-level bodies have never been “directorates” as specified in the MOU, nor is there any central body responsible for protected areas network direction and administration.

The MEW did create a Project Steering Committee as specified in the MOU, but only after the project had already been running for a year. It has only been convened by MEW twice in the fall of 1996.

One is led to conclude that MEW has badly mismanaged their commitments to this project.

#### **4.3.5 *Effectiveness of the National Project Steering Committee***

The Project Steering was to provide high-level guidance to the project and to resolve any major problems that might arise, especially problems between government institutions. The committee was created in late 1996 and only met twice during a time of period of intense conflict between MEW and CoF over their respective roles in PA management. The PSC was unable to resolve this conflict in this brief period; it is not clear how effective it would have become.

#### **4.3.6 *Role of the Global Environmental Facility***

The design of this project was done in accordance with Global Environmental Facility criteria, and the design went through the GEF approval process. However, since that time, the project has had virtually no contact with GEF. The SOW for the evaluation called for the Team Leader to meet with GEF officials in Washington to determine what type of ongoing relationship, if any,

should exist between GEF and the project. However, the Team Leader's time was extended in Sofia at the expense of his visit to Washington, and this part of the SOW was not addressed.

#### **4.4 Donor Coordination**

The Evaluation Team met with other donors active in the biodiversity sector, specifically the Swiss, UNDP, and Peace Corps. The Bulgarian-Swiss Biodiversity Conservation Program has been the other major donor effort in this sector. Its first phase is just coming to an end. The first phase funded 10 projects and worked exclusively with NGOs. It included the preparation of management plans for certain protected areas. The management plans were to be implemented, however, by, or under the direction of, MEW. The lack of MEW institutional structure for protected areas administration/management poses a problem for the end of this first phase. The first phase includes preparation of a management plan for the mountain meadows of Central Balkans National Park by members of an NGO called the Wilderness Fund. This activity began well before the GEF Project began work at Central Balkans. The Director of MEW's park-level body for Central Balkans told the team that there has been no effective coordination between the Swiss-funded activity and her unit.

UNDP GEF has funded regional projects for the Black Sea and for the Danube River in the GEF focal area of reducing pollution of international waters. UNDP reported that they had recently received a request for GEF funding from NNPS for preparation of Action Plans for certain sectors of the NBDCS and had requested NNPS to make modifications to their proposal.

The Peace Corps currently has three PCVs working in parks, all of them around the Central Balkans National Park, working with the CoF, one at their management unit for Central Balkans at Troyan. Five more park volunteers were in training and at least one will get GEF Project support.

The European Union has provided some support to the sector through their PHARE program. Their country program is being phased out and future funding in this sector will be for regional activities.

Donor coordination has been strong in the past and seems to be very good at this point. When the GOB indicated its intention to transfer protected areas management authority to CoF in mid-1995, USAID led the donors in unanimous opposition to this move. Since project start-up, GEF Bulgaria has played a formal role in donor coordination organizing donor meetings every three months. The other donors were clearly well informed on the GEF Bulgaria Project. Both the Swiss and UNDP seem to be very supportive of the need to require MEW to implement the institutional reforms called for in the GEF Bulgaria design.

#### **4.5 Overall Performance of Implementing Agencies**

The Evaluation Team Leader has spent much of his life working on USAID-funded programs and wishes to state here that he has rarely encountered as positive a relationship between USAID and a contractor anywhere else. It has been a pleasure to work on this evaluation where USAID and the contractor are working in partnership to further the purpose and objective of the project.

The Team clearly feels that USAID made some key, strategic errors in the design of this project that remain unresolved to this day. During the implementation phase, however, they have gone to extraordinary lengths to try to get the project back on track when GOB inter-institutional conflicts have brought the project to a halt. Although USAID manages the project out of Washington, DC, the OAR has played a critical role. Twice this has involved taking the issues to high levels in the GOB.

ARD has performed exceptionally well on this project. They have fielded a well-qualified, dedicated professional from their home office as the senior technical advisor and they have created a Project Management Unit staffed with equally dedicated and qualified Bulgarian professional and support staff. This project has been characterized by an exceptional number of major unforeseen events, but ARD and their project staff have always “rolled with the punches” and sought ways to further the project’s objectives while working within the constraints that have existed.

The major problems on this project have come from the GOB institutions. The GOB has failed to clarify the institutional mandates and to create the institutional structure for biodiversity conservation and protected areas management that were foreseen in the project design. While this may be understandable given the major pendulum swings in the politics of the different governments that have been in place during project design and implementation, the lack of a coherent institutional/policy framework remains the critical constraint to achievement of the project’s objectives. Only the GOB can overcome this constraint. The project has arrived had a critical juncture where the institutional reforms must now be made very quickly if the project is to have any reasonable chance of achieving its objectives.

#### **4.6 Overall Progress Toward the Project Purpose**

The Bulgaria GEF Biodiversity Project seeks to improve biodiversity conservation in Bulgaria through institutional capacity-building in MEW and its partners at national, regional, and local levels. This was to be done primarily through the creation and development of a National Service under the umbrella of the MEW. While the project has made significant progress in protected areas management planning at the two pilot national parks, the institutional framework for protected areas management and biodiversity conservation in general has not been put in place for the GOB. Project progress toward creation of a sustainable institutional capacity for biodiversity conservation has been very marginal. The GEF Project is not viable in its current institutional context. If the project is to continue, MEW should quickly undertake these reforms.



## **5.0 Options and Recommendations**

---

### **5.1 Brief Review of the Current Situation**

The future course of the project, if there is to be one, must be charted in light of the challenges and opportunities presented by the current situation. The current situation is very different in several ways from that which existed during project design.

#### **5.1.1 *Political/Economic Context***

Bulgaria's economy has undergone a severe collapse in the past year, which has contributed to major political changes. The most recent government only came into power in May and was still in the midst of restructuring and in the appointment of mid-level officials during the evaluation. The government has undertaken an IMF-sponsored austerity program to control the money supply and restore its credit rating. A new currency board had just gone into effect with severe controls on the money supply. The government has begun reducing the size of its civil service and more significant reductions are forecast for the near future. Budgets for government operating costs are severely reduced.

#### **5.1.2 *MEW Commitment to Protected Areas Management***

This project is intended to develop capacity for protected areas management within the MEW. The Minister and the Ministry during the design phase of this project seemed committed to building this capacity. Minister Georgiev became very supportive during the period of June to December 1996. It was too early during the evaluation to tell if the new, current government will show this commitment. This uncertainty is one of the key factors that must be dealt with in charting the future course of the project.

#### **5.1.3 *Current MEW Institutional Structure for Biodiversity Conservation and Protected Areas Management***

The National Service envisaged in the project design does not exist. The existing NNPS is just a national-level department within MEW with no formal linkages with either the park-level bodies that have been created or with the biodiversity/forestry officers in REIs. The existing NNPS has many functions, some of which it performs quite well. However, it has no national mandate for protected areas management. Park-level bodies have been created, but there is no system of protected areas management. The park-level bodies have been the principal focus of project support to date, but most of their staff are on one- or two-month contracts. They are without means of transportation and without any meaningful operating expenses.

#### **5.1.4 Interministerial Collaboration Between MEW and MAFAR on Protected Areas Management**

Environment and Forestry have been locked in conflict over the question of who should manage protected areas since before the project began. With the new changes in leadership in Forestry and with the new position of Forestry within the Ministry of Agriculture, Forestry and Agrarian Reform, the potential for resolving this long-standing conflict appears to be much better than it ever has been before. However, it has not yet been resolved. MAFAR had not completed its own internal, institutional restructuring at the time of the evaluation. These changes could easily have significant impacts on the potential for future collaboration between the two ministries. At the national park level, Environment and Forestry still have parallel, park management structures that are working separately in an uncoordinated fashion. Both are in the early phases of the development of management plans for Central Balkans and Rila National Parks.

#### **5.1.5 Overall Project Status**

Under its present course, the project will not achieve its four basic objectives during the remaining life-of-project due primarily to the failure of the GOB/MEW to implement the institutional reforms laid out in the project design.

### **5.2 Essential Conditions for the Project to Go Forward**

The Team proposes that the following basic conditions be met before the Project resumes its normal functions:

- **The Evaluation Team considers it to be essential that new protected areas/ biodiversity conservation legislation be passed by the GOB before the project resumes its full range of activities. If new legislation is not passed by March 1998, the project should be discontinued.**
- **If the project is to continue, either MEW must create the NNPS in the institutional form defined in the project design and the MOU, or the GOB should create a completely new institution for protected areas management (and, perhaps, general biodiversity conservation functions).**

**If the GOB agrees to fulfill these conditions, the project should enter an interim phase that would end when the conditions are met (but that would not go beyond the end of March 1998). During the interim phase, the project activities should focus on assistance to the GOB to undertake the needed institutional/policy/legislative reforms. A six-month interim work plan for this period should be prepared. Only activities in support of institutional/policy reforms should be included in this work plan (with the exception of summer field studies programmed for Rila and Central Balkans National Parks because of the restricted seasonal “window” for these activities). Procurement of equipment should be suspended.**

## **5.3 Institutional Options under Which the Project Could Go Forward**

### **5.3.1 Overview of the Three Options Identified**

The Evaluation Team has identified three institutional options under which the project could move forward. The first calls for the MEW to create the National Service as originally envisaged. The other two options call for the creation of completely new institutions. These two options were not discussed with GOB authorities during the evaluation, but GOB commitment to either of these options would be essential in order to pursue them. Both of these options would necessitate a major redesign of the project. Both would require commitment by other donors to continue support for the new institutions beyond completion of the GEF Bulgaria Project, because it would be very unrealistic to complete the development of a new, sustainable institution with the time and resources remaining in the project.

Option I calls for a return, in large part, to the original design with the creation and development of a coherent institutional structure within MEW for biodiversity conservation and protected areas management. The project would then support this new institution within MEW. Option II would create a completely new, independent institute for biodiversity conservation and protected areas management that would be directly under the umbrella of a high level of government, probably the Council of Ministers. The project would be redesigned to support this new institution. Option III would retain biodiversity conservation policy and control functions within the MEW, but would develop institutional capacity for the management of protected areas as a new unit within the Ministry of Agriculture, Forestry and Agrarian Reform. The project would be redesigned with MAFAR as the lead cooperating institution.

### **5.3.2 Option I: Creation of Institutional Capacity Within MEW**

**The Evaluation Team has a clear preference for Option I, the return to the original design as it concerns MEW structures and functions for biodiversity conservation and protected areas management** (although with significantly reduced MEW commitments for finances and personnel). The Evaluation Team's rationale for this preference is fully developed in 5.4.1. Option I, however, is totally dependent upon the commitment of the GOB/MEW to create a coherent institutional structure for biodiversity conservation and protected areas management within the MEW.

#### **Advantages to Option I**

- Of all existing institutions, the Evaluation Team considers MEW to be the most appropriate for the mandates for both biodiversity conservation and protected areas management (see Section 5.4.1 for a full development of the Team's reasoning on this).
- Option I does not require a redesign of the project.
- The project has already invested heavily in human resources development of MEW personnel and their collaborators, especially in the area of park management capabilities and especially with the park-level bodies. Although some of these people might be



recruited into, or transfer to, a new institution, much of this training would have to start anew if a new institution is created.

#### **Disadvantages to Option I**

- The role of field-level resource manager is not typically an appropriate role for a Ministry of Environment. MEW has never felt comfortable with this role since the change in government in February 1995.
- MEW is not a particularly strong or well-funded ministry. Under the new economic realities, MEW will have to rely strongly on developing partnerships for protected areas management, especially with Forestry. Forestry and MEW have had a long-standing antagonistic relationship over protected areas management; although the new leadership in Forestry is now well disposed to working with MEW as the lead, this antagonism still exists at lower levels, particularly within the park-level bodies of each institution.

#### **5.3.3 Option II: Creation of a New, Independent Institute**

##### **Description of Option II**

A new institute mandated with biodiversity conservation and protected areas management would be created. It would be directly under a high level of government, probably the Council of Ministers. The office of the prime minister or the office of the president might also be considered. It would have a structure similar to that of the NNPS foreseen in the original project design (i.e., a national headquarters directly in charge of regional biodiversity officers and of protected area management units). The functions of the new institute would be those foreseen for the National Service in the original design and those proposed under Option I.

It is believed that keeping both general biodiversity conservation and protected area management functions under the same new institute would ensure that protected area management objective of biodiversity conservation would predominate over commercial objectives that could lead to a reduction of the biodiversity of Bulgaria's protected areas.

##### **Advantages to Option II**

- The institute would start fresh with a clean slate and a clearly defined legal mandate.
- A new institution mandated to manage protected areas would probably meet with less resistance from Forestry than does the MEW, due to the long history of conflict between these two institutions on this issue.
- A new institution would be able to hire the most qualified staff through open, competitive recruitment.

### **Disadvantages to Option II That Are Also Common to Option III**

- It would be impossible to create a new, sustainable institution with the remaining time and resources of the GEF Project. A redesigned project could begin the process, but other donors would need to step in to provide follow-on support. If USAID is to consider Option II or Option III, they should have assurance from other donors that they will provide follow-on support beyond PACD of the GEF Project.
- Options II and III would necessitate negotiating a new MOU with a new Bulgarian government institution as well as a major redesign of the project. The MOU would have to be approved by the Council of Ministers. Delays would probably be very substantial—almost certainly greater than under Option I. In the meantime, operating expenses for the PMU and its staff would continue to consume budget resources.
- Either option would require the passage of new legislation as a prerequisite to the creation of the new institution. As passage of such legislation would depend on Parliament, it would be very difficult to estimate how much time this would take. Speedy passage would require strong support from key institutions, and this is not evident (the Evaluation Team did not discuss this option with any Ministry officials).
- The proposal of creating a new institution during this period of severe budgetary restraints within the GOB is not likely to receive strong support from politicians and government officials. Resources dedicated to a new institution would probably have to be taken away from existing institutions.

### **Disadvantages Specific to Option II**

- The evaluation is not aware of any existing political or institutional support for this option.
- Such an independent institute would have no field presence other than new structures it would create. Both MEW and MAFAR have regional offices throughout the country that can provide support for the very large number of small protected areas (well over a thousand in all).
- Option II might take even longer to realize than Option III because Option III would almost certainly find supporters within MAFAR to lobby for the creation of a protected areas management service within the Ministry.
- For the same reason, funding Option II may be more difficult. The Forestry Fund is a potential source of funding for Option III.

### **5.3.4 Option III: Creation of a Protected Areas Management Unit in MAFAR**

#### **Description of Option III**

Option III would create a new unit within the Ministry of Agriculture, Forestry and Agrarian Reform but separate from Forestry. This unit would be mandated to manage the network of protected areas in Bulgaria. It would have a headquarters in Sofia and field management units for individual protected areas. Public outreach and the establishment of partnerships for protected areas management would similarly be the responsibility of this new unit within MAFAR. Biodiversity policy development, international commitments, and control functions would remain with the MEW.

#### **Advantages to Option III**

- This option separates the functions of management from oversight and control.
- The field management capabilities of this Ministry, especially in the Forestry sector, are by far the greatest of any ministry in the country.
- The budgetary and human resources of Forestry are very considerable and could potentially be drawn upon (Forestry has already created about nine park management units using their own resources).
- MAFAR already has management responsibilities for Forest Fund and Agricultural Fund lands. These two categories of land comprise most of the land area of Bulgaria's protected areas.
- Forestry within MAFAR already has some field experience with the management of parks/reserves through their experience at Perin.

#### **Disadvantages Specific to Option III**

In addition to those disadvantages held in common with Option II, the following are specific to Option III:

- MAFAR is strongly oriented toward economic development and commercial activities. The purpose of the GEF Bulgaria Project is, and must remain, biodiversity conservation.
- Most of the protected area lands are forested. Most of the MAFAR foresters that the Evaluation Team met with, including individuals in their park management units, would clearly prefer to manage much of the forested lands within the protected areas for timber production and other commercial, money-making purposes such as tourism and hunting. This includes the IUCN Category II Rila and Central Balkans National Parks.

- It is clear from the interviews conducted by the Team that most MAFAR foresters have a very narrow and incomplete understanding of the principles of biodiversity conservation. There is some indication that the staff in the agriculture department may be even less sensitive to biodiversity concerns.
- MAFAR was in the middle of its own internal restructuring during the evaluation. It is not clear how this may affect the appropriateness of this ministry for the protected areas management function.
- The original design of the GEF Bulgaria Project provides support for both protected areas management and biodiversity conservation in general. Under Option III, the project would provide institutional support for protected areas management capacity within MAFAR. Continued support for biodiversity conservation within MEW would complicate the administrative structure of the project and might not be welcome by MEW if they are no longer the lead collaborating agency.

## **5.4 Preferred Option: Institutional Capacity Development Within MEW**

### **5.4.1 Rationale for the Evaluation Team's Preference**

**Of the three institutional options identified, the Evaluation Team has a clear preference for Option I, the creation and development of an institution for biodiversity conservation and protected areas management under the umbrella of MEW.** The Evaluation Team wishes to explain the rationale for this choice in some detail.

The question centers on the appropriate institutional home for protected areas management. The term “protected areas management” is one that has been very poorly understood in Bulgaria (although the project has recently made major progress in this direction). Indeed, it seems to be one of those expressions that do not readily translate between English and Bulgarian. Translations seem to fluctuate between “maintenance” (implying a detailed, prescriptive set of activities to be carried out following a fixed timeline) on the one hand, and general, high-level guidance or policy on the other.

A protected areas management plan is much more than a policy document, but it is also much less rigid than the typical “forest maintenance project” of the former Committee of Forests. A management plan first defines the objectives of protected area management, then defines the strategies that will be used for achieving those objectives. Implementing agencies, resources, budgets, and general timelines are laid out, but not in a highly prescriptive fashion. A good protected areas management plan should be a “living document.” It lays out a framework of strategies for achieving objectives, along with a monitoring and evaluation system that managers can use as a management tool to periodically review progress and to adjust their strategies accordingly as they learn from experience.

Project consultant John Byrne defined the main components of park management in his April 28 “National Parks Management” report as having the following principal components:

- Mission
- Planning
- Administration
- Natural resources management
- Facilities management
- Visitor use and visitor services
- Partnerships and public participation
- Public education
- Management of activities adjacent to the park
- Achieving results.

As Bulgaria does not yet have a national service for the management of its network of protected areas, the Evaluation Team first considered the suitability of existing institutions for this function. Suitability here is considered independent of existing legislative mandates. Of existing institutions that have closely related capacity and field presence on which to build, there are only two real candidates—MEW and Forestry in MAFAR.

Forestry has many strengths that MEW does not. They have a strong field presence with about 25,000 employees, and an almost military, command-style administrative structure. The Forestry Fund provides them with substantial financial resources during a time of severe budgetary austerity in Bulgaria, although the future of the Forestry Fund under the new government had not yet been decided at the time of the evaluation. What's more, many foresters want to manage protected areas—at least forested protected areas—and Forestry has created, on their own, both a Sofia-based headquarters unit to administer the network and protected area level management units for about seven protected areas. The number and staffing of Forestry's protected area management units is greater than those of MEW. Because of the long-standing conflict between MEW and Forestry, and Forestry's desire to manage protected areas, the Evaluation Team made a considerable effort to meet with representatives of Forestry at several levels (see Appendix B) to assess their capacity and motivations.

Nearly all the foresters that the Team met with have a strong, utilitarian orientation with a classical focus on timber production. Bulgarian foresters have strong ties to classical German forestry with emphasis on conversion of broadleaf stands to conifer plantations and closely regimented management regimes. One gets the impression talking with some of them that they would feel that they have failed professionally if a tree in a forest they were managing grew old, died, and rotted in the forest without being harvested and made into useful products. They argued with the Team that most of the forest stands in Rila and Central Balkans National Parks should at least be subjected to "sanitary felling." Sanitary felling includes the harvest of "mature" trees and the construction of the roads needed to extract the logs. The present status of these two parks as IUCN Category II protected areas would preclude such activities. Bulgarian foresters tend to hold very different ideas from MEW personnel as to what the objectives of protected areas management should be.

While such attitudes and philosophies are subject to change, it would probably take a generation in Bulgaria, as in other countries, for such changes to truly take hold. The Evaluation Team believes that biodiversity conservation would not be a natural priority for the present generation of Forestry professionals if they were in a position to set the objectives for the management of forested protected areas. Primarily for this reason, the Team does not believe that Forestry should be the lead institution for protected areas management in Bulgaria.

The Team found the MEW professional staff, both at the present NNPS and at the park-level bodies, to have both a much greater understanding of, and commitment to, biodiversity and nature conservation. MEW may not be an ideal institutional home for protected areas management, but the Evaluation Team believes that it is better suited than Forestry as the lead institution. If MEW is to accept responsibility for protected areas management in Bulgaria, MEW will also need to accept that they must go beyond their traditional role of controller and play the role of manager and director. The Evaluation Team fully recognizes that MEW is uncomfortable in this role because MEW's traditional role is to control those who manage natural resources—it has never been Environment's role to be a field resource manager.

Since the change in government in February 1995, MEW has lacked a strong commitment from the leadership of the Ministry for the development of protected areas management within the Ministry. MEW also lacks a firm legislative mandate and a coherent, internal institutional structure for biodiversity conservation and protected areas management. Since the beginning of the year, the budgetary resources of the Ministry, as of the government in general, have also become a severe restraint.

New protected areas/biodiversity conservation legislation can be passed if the GOB wishes to make it a priority. The basic institutional reforms needed within MEW should be defined by this legislation. As most of the components are already there, they could be put into place quite quickly. Budgetary restraints are general to the whole government. The apparent solution is to develop protected areas management on a smaller scale than was originally envisaged, especially in terms of MEW contributions, with a strong emphasis on formation of partnerships with other government and non-governmental organizations. Forestry's role may be either large or small. In protected areas with no logging operations, Forestry's role may be relatively small.

The essential ingredient for Option I is the desire and commitment on the part of GOB and the MEW leadership. The new MEW leadership was just developing their team and their program during the evaluation. The budgetary situation was clearly a preoccupation for this leadership. Their level of commitment to the institutional reforms needed for the GEF Project to succeed was not yet apparent. **The Evaluation Team recommends that USAID should not continue the Project without these institutional reforms supported by a clear, new legislative base. The GOB/MEW will need to decide very quickly what direction it will take.**

#### **5.4.2 Institutional Changes Needed**

The key institutional changes needed were foreseen in the project design, in the internal MEW NNPS regulations passed on September 8, 1994, in the draft Protected Areas Act as it existed during the design and in the inter-governmental MOU. **The key elements of the internal MEW institutional reforms needed are the following:**

- **MEW should create one coherent institutional structure (to be called the National Nature Protection Service [NNPS] or something similar) that is responsible for overseeing all aspects of biodiversity conservation and that is directly responsible for protected areas management in Bulgaria. This National Service will consist of a national headquarters, of protected area management units in the field and of biodiversity units housed in the REIs.**
- **The national headquarters should be responsible for:**
  - **development of national policies on biodiversity conservation;**
  - **development of national outreach programs for biodiversity conservation;**
  - **GOB's representation/commitments to international treaties and conventions concerning biodiversity conservation (five at present); and**
  - **management of Bulgaria's system of protected areas. Headquarters' functions will include development of an information base on the network, establishment of national priorities, development of guidelines, monitoring and evaluation, and administration of the network of protected area management units.**
- **The protected area management units will be responsible for managing individual protected areas (i.e., for implementation of protected area management plans). These park-level management units will be directly under the technical and administrative direction of the national headquarters. Many of the management functions may be achieved through development of partnerships with other organizations, but the direction and leadership will come from MEW/National Service employees. The director of each of MEW's protected area management units will be an MEW employee. The rest of the staff could be a mixture of MEW employees and others seconded under interagency agreements from Forestry, municipalities, tourism boards, and others. Management responsibilities for other, mostly small, protected areas could be contracted to other legal entities such as state institutions or NGOs, but under the full control of the National Service headquarters.**
- **The National Service will have biodiversity units at the level of each Regional Environmental Inspectorate. These biodiversity units will have control and outreach functions. The biodiversity and forestry officers in each unit will be under the technical direction of the National Service's national headquarters. Some administrative functions could be delegated to the REI.**

Because of the limited budgetary resources of the State, the need to rely on partnerships to be developed with collaborating institutions, and the opportunities for alternative funding mechanisms for biodiversity conservation and protected areas management, the **Evaluation Team believes that it is essential for the core staff of the management units and NNPS' headquarters to be highly qualified, well-trained professionals, and that these units be given a relatively high level of independence in developing partnerships and funding mechanisms. The Team believes it is very important for the GOB to give both the park management bodies and the National Service headquarters a legal status that allows them to negotiate, secure, and manage off-budget sources of funds; to have their own bank accounts; to hold title to property; and to be able to negotiate and enter into contractual relationships with other organizations.**

**It is highly desirable that the National Service have a high-level advisory board or council. This board should provide oversight and guidance to this National Service and to the MEW. The board should include representatives from groups such as the following:**

- **Ministries including environment, forestry, agriculture, finance, travel and tourism, and regional and urban development**
- **Prime Minister's office**
- **Presidency**
- **Bulgarian Academy of Sciences**
- **University**
- **National and International NGOs**
- **Representative of the donor community active in biodiversity conservation (perhaps as an observer).**

The formation of such an independent advisory body is especially important at this time in Bulgaria given the frequent changes in government and the high rate of turnover of ministers of environment—six ministers in six years. The advisory board would fulfill many of the same functions as the Project Steering Committee (which only exists during the life of the project). When the PSC is recreated, it could be a subcommittee of the advisory board.

**It is also recommended that similar advisory boards or councils be created for each protected area management body. Their membership composition should reflect an appropriate mixture of the local government and non-government institutions that hold direct or indirect interests in each protected area. Their membership would therefore vary from one area to another.**

#### ***5.4.3 Institutional Roles in Protected Areas Management Under Option I***

Given the severe budgetary and resource constraints faced by the GOB and MEW in the foreseeable future, protected areas management will have to be based in large part on collaborative partnerships with other organizations. The word partnership implies that the National Service must enter into agreements with other agencies that share common goals. It also implies that the “partners” are free to cease their collaboration at any point that they find the



relationship to be no longer mutually advantageous. Clearly this type of management approach requires great flexibility as well as a group of managers highly skilled in developing collaborative relationships with diverse organizations.

Despite the need for partnerships, the Team does believe, however, in the basic institutional principle that there needs to be one lead institution in charge of protected areas management planning and of the implementation of the protected area management plans. One cannot have separate, parallel bodies working independently and responsible to different hierarchical chiefs. That would be a formula for the creation and multiplication of problems. Under Option I, this lead institution must be the MEW.

**MEW's National Service should have two principal roles in protected areas management—preparation and implementation of protected area management plans. The National Service headquarters should play the following roles in protected area management planning:**

- **initiate the planning process for a given protected area as a function of overall priorities for the protected areas network;**
- **develop the TOR for the planning process;**
- **constitute a planning team of specialists from MEW/National Service, Forestry, Academy of Sciences, NGOs, etc., with someone from MEW as team leader. Management unit professional staff for the protected area should be included where these units already exist. The planning team should:**
  - **gather background data and conduct new studies as needed;**
  - **propose the management objectives for each park (to be approved by NNPS);**  
**and**
  - **draft the management plan;**
- **apply MEW/National Service procedures for the review and approval of management plans.**

**Particular importance should be placed on the definition of management objectives because a management plan is basically a strategy for achieving objectives. Objectives should be defined in a participative fashion and should take into account scientific criteria, international agreements, and socioeconomic factors.**

**The Evaluation Team recommends the following role for the National Service in the implementation of management plans** (again, the consultant report by John Byrnes has been used as the basic outline for park management functions):

- *Planning*: the National Service management unit staff should play the lead in developing annual work plans in partnership with the collaborating agencies and within the framework of the management plan for the protected area.
- *Administration*:
  - development of collaborative partnerships for park management activities and formalization of these partnerships under written contracts or other written agreements;
  - ongoing coordination of the collaborating agencies working in partnership on park management;
  - recruitment and development of National Service personnel and team-building with the personnel of collaborating agencies;
  - recruitment and direction or coordination of volunteers;
  - fundraising, budgeting, financial management, and accounting;
  - procurement; and
  - development of administrative orders/regulations.
- *Natural resources management*: this would include fauna and flora management (inventories, monitoring, control, endangered species rehabilitation), management of concurrent uses (livestock grazing in mountain meadows, hunting, fishing, watershed management), fire management (detection and suppression and controlled burning), and control functions (patrols, guarding, checks on concurrent users, enforcement). Most of these functions would be undertaken by collaborating agencies under formal agreements and the National Service staff role would be overseeing and coordinating these agreements. Some functions may be handled directly by NS staff (for example, an NS staff member may be recruited to develop and manage a program of contract grazing in the mountain meadows at a park like Rila or Central Balkans).
- *Facilities management*: to be handled under agreement with collaborating agencies or directly by NS staff as found appropriate at each site. NS staff should seek to develop contracts with municipalities, tourism boards, or others for the management of the chalets in the mountain parks.
- *Visitor use and visitor services*: includes information and interpretive services, search and rescue, law enforcement, lodging, and visitor service providers inside and outside the parks. All of this needs to be coordinated by NS staff, but most of the functions could be filled under agreements with other organizations.
- *Partnerships and public participation*: development of partnerships and public participation is a key role that NS staff should be directly responsible for.

- *Public education*: this function should be handled by NS staff and by partners through formal and informal agreements.
- *Management of activities adjacent to the park*: NS staff need to play the lead role in coordinating with land and property owners/managers and facility.

### **The Role of Forestry in Park Management**

**Forestry's role in protected areas management must be negotiated between MEW/National Service, and MAFAR/Forestry. Forestry's role in the management of each protected area should be primarily a function of the protected area status and the defined management objectives and management activities for the individual protected area.** In non-forested protected areas, Forestry may have no role at all. The most critical factor determining the level of Forestry's participation for a given protected area will probably be the level of forest harvest (logging) and reforestation operations prescribed in the management plan. The inclusion of harvest and reforestation operations for a given protected area would call for a large role for Forestry because they are highly specialized in this area. If the management plans for national parks such as Rila and Central Balkans do not allow for logging and reforestation, then the role of Forestry will be much smaller.

**If one looks at the above outline of protected area management functions, appropriate roles for Forestry include:**

- **Natural resources management—many of these functions could be filled by Forestry, especially field-level interventions to manage the fauna and flora of a protected area, fire detection and suppression and controlled burning, and the control functions (see below).**
- **Many of the facilities management functions, especially involving roads and trails in the protected areas.**
- **Some of the visitor use and service functions, especially search and rescue, some of the information and interpretive services, and the enforcement functions.**
- **Part of the public education role.**
- **Much of the management of areas adjacent to protected areas—Forestry is the principal landowner around some of the major parks like Rila and Central Balkans. There is a clear need for coordination between park management and management of Forestry's adjacent lands.**

**A major role that could easily be filled by Forestry, at least for forested protected areas, is that of patrols and surveillance (i.e., the “ranger” function).** At present this is done at the level of the Forest Enterprise and guards cover both commercial forest lands outside the park and forest lands inside the park. **It would be highly desirable to reorganize this function to have**

one group of rangers for each park that do surveillance only on park lands. The same rangers should patrol all categories of land within the park—forests, mountain meadows, and wetlands. Furthermore, these rangers should receive specialized training in other areas, especially visitor services including interpretive services, guiding, first aid, and search and rescue. Rangers could also perform certain monitoring functions within the protected areas. All rangers in a protected area should be under the direction of one person in the management unit. The rangers and their supervisor could all be seconded from Forestry under an interagency agreement.

**The present situation under which MEW and Forestry have separate, parallel, park-level management bodies must be addressed immediately.** MEW and MAFAR need to work out an interagency agreement detailing how the resources of each Ministry may be used in a collaborative effort within the framework led by MEW, as outlined above. Under Option I, MEW must assume the leadership role between the two.

#### ***5.4.4 Need for an Institutional Assessment of Biodiversity Conservation Functions***

The Team understands that MEW is undertaking their own assessment of their general biodiversity conservation functions and the institutional framework for these functions, but we strongly recommend that MEW seek project assistance to complement their own review with an independent institutional assessment conducted by a well-qualified professional or professionals in this area. Eventual refinements to the NNPS institutional framework outlined above as well as the programming of further project support for biodiversity conservation outside of protected areas should be functions of the combined findings of the internal and independent assessments.

#### ***5.4.5 A Strategy for Proceeding with Option I***

Option I is totally dependent on the MEW's willingness to push new protected areas legislation and to implement the needed internal reforms recommended above, their willingness to accept project support for an overall institutional assessment for their biodiversity conservation functions, and their willingness to make use of the results of this assessment. **USAID should undertake discussions immediately with MEW to determine MEW's willingness to undertake these actions. If MEW declines, then USAID should begin discussions with the GOB on the potential of redesigning the GEF Project toward Options II or III.**

If MEW agrees to pursue Option I, the Evaluation Team believes it is critical that a firm legal basis be established before the project continues "business as usual." This means passage of new protected areas legislation. The past two years have clearly demonstrated the folly of proceeding with project implementation in the absence of this legislation. **The Project should enter an interim phase geared primarily toward supporting GOB/MEW in undertaking the needed policy/institutional reforms to create a sustainable institutional framework for biodiversity conservation and protected areas management in Bulgaria. Appropriate project support for these policy reforms would include the following:**

- **assistance in drafting new legislation that clearly defines institutional mandates, structures, and functions for biodiversity conservation and protected areas management;**
- **technical assistance to conduct a full institutional assessment of MEW's mandates, structures, and functions for biodiversity conservation as described in 5.3.3 above;**
- **a study tour for high-level officials to the USA to review and assess the applicability to Bulgaria of U.S. experience in policy and institutional arrangements for biodiversity conservation and protected areas management; and**
- **preparation for a fifth anniversary review of the National Biodiversity Conservation Strategy with a strong emphasis on the policy and institutional framework needed.**

**The planned summer field studies at Central Balkans and Rila National Parks should go forward**—the project already lost one field season and cannot afford to lose a second if management plans are to be developed. However, they should go forward only if the parallel summer field studies planned for Central Balkans by Forestry are either canceled or there is full collaboration developed between Forestry and GEF avoiding duplication and waste. During the interim phase focused on policy reforms, other project activities should be significantly reduced, and the procurement of equipment for the two pilot parks should be suspended until passage of new protected areas legislation.

**The interim phase will require very close involvement on the part of USAID. The COTR will either need to make more frequent visits to Bulgaria during this period or stay for more protected periods as needed.**

#### **5.4.6 MOU Revisions Needed Under Option I**

Even if new protected areas legislation is passed, the MOU between GOB and USAID will still need to be revised. GOB/MEW budgetary and staffing commitments in the appendices of the existing MOU are not realistic and need to be revised downward. At the same, the wording of the existing MOU concerning the creation of the National Nature Protection Service within MEW is not at all explicit. The revised MOU should make these reforms explicit, and the revisions should be in full agreement with the new protected areas legislation. The MOU revisions should detail the role of USAID support to MEW for implementation of the new legislation. Although MEW and USAID should begin to negotiate on the content of the MOU revisions as early as possible, the revised MOU should not be signed until after passage of new protected areas legislation.

It is the Team's opinion that none of the details that the Evaluation Team proposes for inclusion in the revised MOU are in disagreement with the body of the existing MOU. It should therefore be possible to include all these details in an appendix to the existing MOU. **Specific topics to cover in the revised MOU should include the following:**

- reduced budgetary and staffing commitments on the part of MEW;
- explicit details on the institutional reforms to be implemented by MEW; and
- the nature of USAID support to MEW for implementation of the new legislation.

## **5.5 Other Recommendations**

### **5.5.1 *Movement Between CLINS***

The Evaluation Team was asked to make recommendations on the need/advisability of making changes between line items in the USAID/ARD contract. Given all the uncertainties on the future of the project, the Team feels it is clearly premature to make such recommendations at this time. The option should be kept open for the future as circumstances warrant.

### **5.5.2 *Increase in Obligations to Match the Amount of the Contract***

If any of the institutional options presented in this section prove to be viable and the GOB undertakes the necessary reforms so that the project can go forward, the project will need all the resources possible to accomplish its objectives in the remaining time. If this happens, the Team recommends that USAID increase its project obligations to the level specified in their contract with ARD (i.e., \$4.23 million).

### **5.5.3 *Increased Attention to Linkages Between Science and PA Management***

**The Evaluation Team recommends that the project pay increased attention to the definition of appropriate linkages between science and PA management.** This is probably one of the areas in which the American tradition of PA management is the weakest. PA managers need to devote considerable effort to defining as exactly as possible what their information needs are to properly manage their protected areas. These must include information needs for the definition of biological priorities for biodiversity conservation and for the identification and analysis of threats and pressures on protected areas biodiversity. The causal factors of pressures must be fully analyzed and understood in order to develop effective strategies for diminishing these pressures. In order to develop effective strategies, all of these analyses must have a strong spatial character to them.

The TORs for consultant studies should define the linkages between the studies to be conducted and the protected area management information needs. The consultants should meet with PA planners and managers to discuss these linkages before beginning their studies. The consultants should be required to present these linkages in the introduction to their reports and should make specific recommendations in their reports as to how the planners and managers can best use their results for managing the protected areas in question.

#### **5.5.4 Support for Biodiversity Conservation in the Forestry Sector**

The Team was asked to identify new opportunities in the biodiversity conservation area that have developed since project design. The Team believes that one of the greatest new opportunities is in the forestry sector. The Committee of Forests was not a very active participant in the preparation of the NBDCS. Bulgarian forestry professionals have a poor understanding of biodiversity conservation and lack training and experience in this area. The new leadership of Forestry, however, is very interested in changing this situation. This presents an opportunity to have a real impact on forest biodiversity conservation in Bulgaria.

Possibilities include the following:

- development of a forestry subsector strategy or action plan;
- review and reform of curricula for forestry schools at the university and technician level; and
- organization of a forest sector symposium on the cutting-edge topics of forest biodiversity conservation/forest health/ecosystem management.

#### **5.5.5 Support for a Five-Year Review of the National Biological Diversity Conservation Strategy**

Another idea that the Team developed that received very positive support from nearly everyone is the idea for the project to sponsor a five-year review of the NBDCS. Bulgaria's strategy was one of the earlier national strategies done in the world. The Team is not aware of any other country having conducted a five-year review. It would be especially appropriate for Bulgaria because Bulgaria's experience in developing the strategy was such a positive one and their NBDCS is recognized as being one of the best examples of a national biodiversity strategy. As many countries around the world are just now beginning work on their own strategies, a review of the Bulgaria experience could be not only valuable for Bulgaria, but for many other countries. Such a review should attract significant attention in Eastern Europe where Bulgaria's strategy is well known, but several other countries have not done their own.

Areas covered in the five-year review could include the strengths and weaknesses of the process that was used in developing the NBDCS as well as the strengths and weaknesses of the strategy itself. Implementation of the strategy to date would be a major focus of the review and would lead to recommendations for future actions. Much of this should have direct applicability to the GEF Bulgaria project and to MEW and its partners.

Ideally, it would be desirable that such a review could be done during the coming interim phase of the GEF Bulgaria Project, and early enough so that the results could be used to affect the future course of the project. It is not clear whether this timing would be possible. To do a meaningful review of the NBDCS, one would want to prepare carefully and to contract key individuals to prepare papers for presentation at the review.

## **Appendix A: Statement of Work for the Evaluation**

---

### **Purpose**

This mid-term evaluation is expected to both confirm and adjust the project's objectives, scope, activities, implementation mechanisms, and budgetary allocations. It is intended to be a formative evaluation. Both the content and direction of USAID-supported, ARD managed, biodiversity conservation efforts in Bulgaria will be examined. The evaluation process will review all project assumptions, implementation history, management mechanisms, technical issues, and project relationships with project participants and stakeholders. Preliminary findings will contribute to the annual project review. Evaluation recommendations will serve as the basis for preparation of the second annual work plan.

### **Background**

The Bulgaria Global Environmental Facility Biodiversity Conservation Project (locally known as GEF) was designed with Project Preparation Assistance (PPA), to the Ministry of Environment (MoE) from the World Bank, in the first half of 1994. USAID agreed to fund the resulting project, with some modifications, issuing a Request for Proposals (RFP) later that year. Proposals were submitted in December 1994, and a contract awarded to ARD in July 1995. A contract amendment of September 1995 provided for an amalgamation of a two-phased project into one continuous project period. An additional contract modification of August 1996, provided for completion of the project in December of 1998.

Donor missions to Bulgaria in the early 1990s identified biodiversity conservation as an important concern for biogeographical, historical, and institutional reasons. These missions were among a host of others designed to support political, social, and economic transition processes in much of central and Eastern Europe.

USAID has been an important contributor to Bulgaria throughout the transitional period. Notably, the Biodiversity Support Program assisted in development of The National Biological Diversity Conservation Strategy. USAID also funded several activities through the U.S. National Parks Service, and other smaller programs. The Swiss government and the European Union have provided substantial funding to environmental planning and management. Several other bilateral programs have assisted protected area management and biodiversity conservation as well.

The purpose of the Bulgaria GEF subcomponent of the Improved Public Sector Environmental Services Project focuses on strengthening the nature protection management system at the national and regional/local levels. This includes establishment of an institutional framework, and development and implementation of sound management strategies for the protection of areas of significant biodiversity.



Suggestions for institutional modifications to the project by the Government of the Republic of Bulgaria (GOB) delayed the fielding of GEF, and establishment of a local Project Management Unit (PMU), until February 1996.

Although not explicitly stated as such, the PPA and RFP assumed that an existing draft Protected Areas Bill would become law. This law has not been passed. As a result, jurisdictional roles and responsibilities for various aspects of protected areas administration and management have been both unclear, and in dispute between MoE and the Committee of Forests (CoF). This dispute was partially reconciled by a Tripartite Agreement among the Ministry of Environment, USAID, and the CoF in August of 1996. General acknowledgment was given to the vested interests of both Bulgarian parties in protected area management and participation in GEF project activities and benefits.

In addition, formation of park-level bodies by MoE and envisaged expansion of staff and responsibilities of the National Nature Protection Service (NNPS) were not undertaken, or were delayed, for legal and financial reasons. CoF has disputed or opposed many aspects of the project, and throughout 1996, conducted parallel activities at the park level.

The interim government in Bulgaria, appointed in February 1997, has implemented reform measures that promise to alleviate many of the institutional problems experienced by GEF. Eventual success and stabilization of these measures will only be confirmed after an elected government is in place (parliamentary elections will take place in mid-April 1997). However, as a consequence of the drastic economic decline in 1996 and 1997, budgetary support for nature protection will be severely limited in comparison to the expectations and intentions embraced in the Memorandum of Understanding, that governs the relationship of USAID and the Government of Bulgaria (as represented by the Ministry of Environment).

This evaluation takes place after the project has been in the field for approximately 1.5 years. It is a contract requirement. It is supervised and managed by the Contractor, ARD. This evaluation is somewhat unusual in the context of more standard mid-term evaluations for USAID.

Because of these circumstances, this evaluation will consider past performance of the project and issues arising, and assist in charting the future course of the project. The evaluation team will provide guidance for optimizing remaining resources aimed at achieving GEF goals and objectives in light of past, current, and expected developments.

The evaluation also coincides with a significant and apparently favorable change in government policy toward institutional arrangements for protected areas. The ARD team generally believes that favorable developments within the MoE and the CoF will be maintained and improved as a consequence of impending elections. At the same time, economic problems severely constrain government funds available for biodiversity conservation and protected areas.

## **Evaluation Themes and Issues**

### **I. Fundamental Issues**

#### Links with the multilateral Global Environmental Facility

The project is somewhat unusual in its status as a GEF project. More accurately, it is a USAID contribution to the GEF, operated and managed under the supervision of traditional USAID mechanisms. While counted toward the U.S. contribution to the multilateral GEF, the project maintains little if any formal contact with the GEF mechanism organized and managed by the tripartite group—the World Bank, UNEP, and UNDP. At present, there are no known formal reporting or evaluation requirements between the project and the GEF.

### **Implementation Issues and Assumptions**

The PPA lists scores of proposed activities in some detail. The RFP is much less “prescriptive”—identifying important themes for protected area management and biodiversity conservation in Bulgaria. In large part, ARD’s response to the RFP reflected itself in a proposal devoted to processes to be employed in achieving the project’s goal. Implementation of the project in Bulgaria, however, has been forced to respond to circumstances unforeseen in any of these documents.

The project has experienced substantial delays in award of a contract, prior to fielding the team, and then again, while the team had been operating in country. These delays raise several issues, which the evaluation will explore. These include:

- design assumptions concerning Bulgarian institutional arrangements that were not realized;
- assumptions concerning enactment of a “Protected Areas Bill.” It was expected that the Bill would provide the framework, roles, and functions for Bulgarian institutions, for their different management relationships in and around national parks. To date, the Bill remains only a draft;
- whether fielding the ARD team before these design assumptions were in place, or clearly in process was wise; whether having the team present was viewed as productive or counter-productive in resolving outstanding issues, or improving prospects for achieving project goals and objectives;
- delays in award of contract; and
- political and economic changes in Bulgaria, which have prevented GOB from fully implementing the Memorandum of Understanding (MOU), particularly with respect to financial commitments and obligations.

The team will evaluate all relevant project documents (PPA, RFP, GEF Proposal, “Draft” Work Plan, quarterly reports, the MOU and Tripartite Agreement between the Committee of Forests, the Ministry of Environment, and USAID). It will describe evolution of the project over the last three years. Changes in emphasis, direction and modes of operation will be identified, outlined and serve as points for documentation and discussion.

**Pertinent evaluation questions include:**

- Have USAID and ARD responded adequately to circumstances as they have arisen in terms of implementation, or should a different approach to these issues have been considered/acted upon?
- Is ARD’s mode of implementation in line with project philosophy, goals, and objectives? Has ARD employed the most effective mechanisms in response to political and institutional conditions and the absence of policy and supporting legal reform?
- Is the “Results Framework” now employed by USAID for the draft Work Plan in line with prior project documentation, project goals and objectives, and prevailing Bulgarian conditions?

As this is a formative evaluation, the team will focus, in detail, on proposals for future implementation of the project. Particular attention will be paid to whether changing political, economic, and institutional circumstances in Bulgaria call for redirection of some project activities and budget allocations.

**Additional evaluation questions include:**

- What new challenges and opportunities are developing, and how should project implementation address them?
- What changes, if any, should be made to project philosophy, goals, objectives, and the results framework?
- What changes, if any, should be made in project mode of operation?
- What changes, if any, should be made to the mechanisms employed in support of project implementation, conflict resolution, and policy development?
- What changes, if any, should be made to the specific types of activities to be undertaken?
- In view of any suggested changes, should contractual budget line items be modified (for example, shifting money from one CLIN to another)?

- How can the project best serve the needs identified in the remaining time and yet remain flexible and responsive in the implementation of activities for the second half of the project?

### **Oversight, Management, and Communication Issues**

The supervision, management, and communication circumstances of GEF are more complex than is typically the case in USAID country projects. The Contracting Officer and the Contracting Officer's Technical Representative are based in the USA. The COTR makes periodic trips to Bulgaria to engage in intensive project activities, political negotiations, and provide management support. A Contract Specialist was in country for several days in mid-1996 for discussions about project issues, especially formulation of a contract amendment. ARD's home office, and the GEF Project office maintain communication with USAID/Washington and the OAR. The frequency, circumstance, and nature of communication depend on a host of factors related to project management and aspects of strategy and/or technical implementation.

The OAR in Sofia maintains an active interest in the project and has provided important support on several crucial occasions, even though it has no direct management responsibility. GEF is included in the OAR "Results Framework" and has potential areas of collaboration with other aspects of the country program.

### **Pertinent evaluation questions include:**

- Has the present contractual relationship between ARD and USAID worked to the best advantage of project management and implementation? If not, where and how could it improve?
- Specifically, what USAID project management—administration, communication, budget supervision, reporting, planning formats and documents, and approval mechanisms—need improvement and/or adjustment?
- How does the host country government view the contractual roles, responsibilities, and obligations between USAID and ARD? Do they envision improvements in this relationship, and, if so, how?
- What ARD project oversight and management mechanisms could benefit from greater attention, adjustment, or improvement?

### **Institutional Agreements and Cooperative Mechanisms**

MoE is the implementing agent for GOB. In general, project oversight responsibilities are divided between the appropriate Deputy Minister, and the Director of NNPS. One member of NNPS staff is charged with liaison and assistance functions for the project. MoE is also responsible for establishing, convening, and administering a Project Steering Committee (PSC). In general, routine MoE communications are with the OAR over project policy issues, and with

the PMU over management, technical, and logistical issues. The COTR has intensive contact with MoE during field visits. At other times the OAR generally acts on behalf of the COTR in relationships with the GOB.

There is no bilateral agreement between the U.S. and Bulgarian governments covering the operation of USAID-funded projects. Overall Project relations are described in the MOU, but important details concerning the legal status (e.g., the PMU and its personnel, tax, and immigration status) are not covered. ARD depends upon local legal advice and support of MoE for tax and duty-free importation of project equipment, residence visas, and other related issues.

A new government will soon be elected. Possible appointments of a new minister and deputy ministers, are imminent. They will most likely take place before the evaluation team begins work. While the Director of the NNPS has been in position throughout the project and its design, it may, nonetheless, be difficult to determine project/MoE relationships at a high level.

The evaluation team will seek to elaborate on MoE's collaborative and operational oversight role in the project with respect to the MOU and other relevant documents.

**Pertinent evaluation questions include:**

- How well has MoE fulfilled its obligations under the MOU with respect to administrative aspects of the project? What are the constraints and opportunities inherent in this relationship? How should the MOU be addressed with respect to the remainder of the project?
- Is the PSC effective as a consultative and advisory body to the project? How might its effectiveness be enhanced?
- Is the relationship between MoE, the OAR, and the PMU effective in facilitating operational and administrative aspects of project implementation?
- What additional mechanisms (if any) are needed to ensure collaborative and coordinated implementation and oversight in the project?
- In the absence of a bilateral agreement, will the MOU be sufficient to support and guide outstanding and/or recommended project activities? Or will it need to be modified and/or adjusted?

**Project Participation and Partnerships**

Much of the ARD proposal and considerable strategic emphasis has been placed on forging and maintaining high levels of participation and partnering in the project. Attempts have been made to develop participation mechanisms and methodologies that build a vested interest in the project's objectives and activities. Importantly, the evaluation team will want to examine project

efforts to encourage national, regional, and local participation, as well as to examine partnerships in support of the project.

In addition, the evaluation team will want to investigate the roles and review the present/future levels of support for biodiversity conservation and protected areas from other bilateral and multilateral donors. The Swiss government, the European Union, and other donors have ongoing and/or planned programs related to biodiversity conservation and tourism. USAID also has other programs in democratization, local governance, and enterprise development that have potential in maximizing the impact of GEF, particularly at the regional/local level.

**Pertinent evaluation questions include:**

- How well have the project's participation mechanisms served its objectives?
- Which partnerships have been created to best effect, and which should be further encouraged? Consider these at national, regional, and international levels. How might the project effect better working partnerships, with whom, and in what capacity?
- Has the project succeeded in identifying and engaging protected area stakeholders and to best effect? How might these relationships be improved?
- How effective is the project in coordinating with related donor efforts?
- How might such relationships be developed to enhance sustainability of activities when the project ends?

**Technical Issues—Strategies, Approaches, and Activities**

The GEF Project is designed to address a host of technical issues related to protected area management and biodiversity conservation. Technical consultancies have been conducted in support of GEF activities and results packages. The evaluation team will review the technical strategies, approaches, and components of the project; cluster these into appropriate categories; and evaluate the timing, coverage, and thoroughness of the project's technical components in the prevailing context. Practical recommendations should be made so as to guide the prioritization and scheduling of future technical activities of the project. Proposals should be exhaustive, but not prescriptive; thorough, yet respectful of the prevailing conditions and realities of operations in Bulgaria.

**II. Evaluation Context and Tasks**

**The Past and Present**

The team will analyze and evaluate the performance of, and influences upon, the Contractor (home office, PMU, and consultants), USAID (Washington and OAR), and MoE and other

Bulgarian partners. This analysis will focus upon the questions and issues listed above, and on related issues that may arise as the evaluation proceeds. Where appropriate, the evaluation team will recommend strategies and mechanisms (specifically) to improve the functional relationships between key project stakeholders. In addition, the team will focus on the strengths and weaknesses of all aspects of project implementation. Importantly, a concise, documented history of the context in which this project has evolved and operated will be produced.

## **The Future**

Significant changes in circumstances surrounding the project in Bulgaria have occurred during the first half of 1997. In 1995 and 1996, GEF experienced significant delays (which affected fielding the project) and, subsequently, programmatic shifts and institutional problems. As a result, the project is somewhat different from that which was designed and contracted.

Time is appropriate for review of programmatic and budgetary priorities of the project. Recommendations should be clear, cogent, and designed to optimize the project's impact for the remainder of the implementation period. The team's analysis of the issues listed in previous sections should serve to guide the following tasks.

## **Evaluation Team Tasks**

1. Organize the Evaluation Team in order to conduct a preliminary review of this Statement of Work, and provide written comments to the COTR with suggestions for preliminary adjustments to content and methodology, if any.
2. Review key project documents including: the National Biodiversity Conservation Strategy, the World Bank-supported Project Design study (PPA), the RFP, Proposal, contract and amendments; Memorandum of Understanding (MOU) between U.S. and Bulgarian governments; ARD's proposal and work plans, monthly, quarterly, and annual report(s); consultant strategy, scoping and technical reports; relevant memoranda, correspondence, and other materials.
3. Build a team that is organized around evaluation themes, tasks, and competencies. Assign and organize evaluation tasks and writing assignments.
4. Hold preliminary briefing and information-gathering meetings in the USA (or by remote communication—telephone or E-mail, if deemed necessary) with USAID staff in Washington, DC (past and present COTRs, and contract staff), and with contractor ARD in Burlington, Vermont.
5. Finalize any proposed amendments to the Bulgarian component of the SOW and submit to the COTR, for approval, prior to travel to Bulgaria.
6. Travel to Bulgaria for continuing review of documentation and meetings with key groups and individuals including:

- ARD project staff and consultants;
- USAID-Sofia;
- MoE/NNPS staff in Sofia, and both Central Balkans and Rila National Parks;
- “partner” organizations in Sofia, and the field (other central and local government organizations, NGOs, related field projects); and
- related donors/donor projects.

7. Analyze findings in relationship to the issues listed in the previous section, and others that may arise. Provide the ARD, USAID, and MoE Project members with weekly debriefings as necessary.

8. Develop and review, in consultation with the main parties involved, recommendations for future conduct of the project in light of the team’s findings.

9. Prepare and arrange for circulation and comment a draft final report documenting project history related to major issues, findings, and recommendations prior to departure from the country.

10. Debrief with main project partners in Bulgaria and the USA.

11. Finalize the report in light of comments received.

## **Methodology**

Results of the formative evaluation will augment the first annual work plan review to be conducted in country, close to the conclusion of the evaluation exercise. It is expected that the results of the evaluation will be used to structure and guide “Year 2” project activities.

Therefore, this evaluation exercise will consist of:

- a focused literature review and summary of outstanding issues pertinent to both the history of this sector in Bulgaria, as well as the project;
- a series of focus group interviews of USAID and ARD project staff;
- a series of focus group interviews of key national stakeholders, organized and conducted along institutional lines;
- individual follow-up interviews among the key leaders and managers within institutions and organizations;



- at least one, possibly two field trips—to one/two of the National Parks receiving GEF Project support, with appropriate focus group and individual discussions including MoE/NNPS Inspectorates, CoF Park Management Units, NGOs and municipalities, and regional public groups;
- identification and prioritization of complementary donor support and interest for the sector, and interviews as appropriate/needed; and
- preliminary review of results and recommendations in a workshop setting that complements the project's annual review process.

### **Expected Outputs**

- Draft outline of the categories and topics to be addressed in the Evaluation report, one week after commencing the evaluation exercise.
- Preliminary briefing of results and recommendations for USAID and ARD, 2.5 weeks after arriving in Bulgaria.
- Presentation of results and recommendations to project annual review group after 3 weeks in Bulgaria.
- Draft report of results and recommendations due upon completion of Bulgarian component of evaluation.
- Final report incorporating comments and feedback from annual review, ARD and USAID, by mid-August. The final report will be a clear, concise, and practical analysis and summary of evaluation documentation and recommendations.

### **Personnel**

A three-person team will be appointed, and form the core group for the evaluation exercise. The team will comprise:

- a team leader with broad ENR programmatic, institutional, and policy expertise, as well as USAID evaluation experience;
- a specialist in the field of biodiversity conservation and protected areas; and
- a Bulgarian, with strong facilitation skills, and sound understanding of environmental conservation and institutional development in a Central and Eastern Europe (CEE) and national context.

The team's composition, experience, and qualifications will cover fields of expertise pertinent to the project. These include: environmental institution development and policy; evolving

environmental and natural resource management mechanisms in Central and Eastern Europe; financial mechanisms in support of protected area conservation, human resource development, protected area administrative and management systems, organizational structures, and complex governmental relationships relative to national protected area management and conservation; USAID project organization and management systems; international protected area categorization; biodiversity research and monitoring; visitor management and services; outreach—public information, education, and community relations; protected area management planning; ecotourism; and Bulgarian natural resource/biodiversity academic, governmental and non-governmental institutions, and international biodiversity conservation projects.

Elements of decentralized management, financing, and links with other national, regional, and local initiatives will be importantly considered.

The Bulgarian evaluator will participate only in the Bulgarian component of the evaluation exercise, and not in the U.S.

### **Evaluation Administration**

ARD/Bulgaria, will provide all administrative, logistical, and communication support needed by the team during their stay in-country.

ARD/USA will organize all international travel, payments, travel advances, USA country meetings, and arrange for the reproduction of all pertinent project documentation, as well as reproduction of the final evaluation report.

### **Level of Effort**

Team Leader	33 days
Biodiversity Conservation Expert	29 days
Bulgarian Team Member	26 days

<b>Total Level of Effort</b>	<b>88 days</b>
------------------------------	----------------

### **Projected Timetable (1997)**

June 15	Travel to Burlington, VT, ARD HQ (international consultants only)
June 16	Briefing and Orientation in Burlington for relevant team members
June 17	Travel to Bulgaria
June 18-21	Orientation to USAID project management and programming in Sofia - feedback on Evaluation SOW methodology and content to ARD PMU and USAID team
June 23-28	Week 1 – Team-building, draft outline of Evaluation Report, and Sofia-based activities
6/30-7/5	Week 2 - Field trips and continued evaluation activities
July 7-8	Recommendations and Debriefings - draft report
July 9/10	Annual Appraisal Workshop and Evaluation recommendations presentation
July 11	Final debriefing and incorporation of workshop outputs
July 12	Depart Bulgaria
July 13	Arrive USA
July 14/15	Team Leader conducts preliminary review of recommendations and management functions with USAID - Washington, ENI Bureau, and meets with GEF and BSP programs (as required)
July 21	Final Draft Report Submitted to Team and ARD for final review and comments (Report writing - 2 days {Team Leader Only})
August 4	Presentation of Final Evaluation Report to USAID/Washington by ARD Senior Resident Advisor; review of major conclusions and recommendations with COTR/ENI Bureau and Contracts Office

## Appendix B: List of People Interviewed

Name/Place	Title/Position	Institution
<b>BURLINGTON</b>		
George Burrill	President	ARD
Peter Hetz	Associate, Project Manager	ARD
William Hegman	Associate, GIS	ARD
Robert Yoder	Dr., Senior Associate	ARD
Brian Guse	Assistant Project Manager	ARD
Linda Lind	COTR	USAID/Washington, DC
<b>SOFIA</b>		
John Tennant	USAID Representative	USAID/OAR
John Babylon	USAID Program Officer	USAID/OAR
Linda Lind	COTR	USAID/Washington, DC
Petar Pojarski	Project Officer	USAID/OAR
Ian Deshmukh	Dr., Chief of Party	PMU permanent staff
Marieta Sakalian	Dr., Project Coordinator	Same
Kamelia Georgieva	Training Coordinator	Same
Vesela Gendurova	Secretary, Administrative Assistant	Same
Maria Nikolova	Computer Specialist, Accounter	Same
Krassimir Kostov	Logistics	Same
Svetlana Aladjem	Media Expert	PMU Consultant
Emilia Voinova	Psychologist	Same
Plamen Vulchev	Sociologist	Same
Nikola Yordanov	Psychologist	Same
Anna Mihailova	Sociologist	Same
Gary Forbes	Organization Consultant	Same
Hristo Delchev	Dr., Zoologist	PMU Expert

Zdravko Hubenov	Dr., Zoologist	Same
Dimitar Peev	Dr., Botanist	Same
Taniu Michev	Ornithologist	Same
Maya Stoineva	Botanist	Sofia University
Vladimir Velez	Botanist	Central Laboratory of General Ecology
Georgy Hiebaum	Dr., Director	Same
Evdokiya Maneva	Minister	Ministry of Environment and Waters
Mariana Lukova	Deputy Minister	Same
Jeko Spiridonov	Head of NNPS (till 2/07)	Same
Dimitar Stoev	Head of NNPS	Same
Mira Mileva	Chief Conservation Officer NNPS	Same
Lubo Profirov	Expert NNPS, animals	Same
Raina Hardalova	Expert NNPS, plants	Same
Konstantin Ikonov	Forester, Deputy Minister	Ministry of Agriculture, Forest and Agrarian Reform (MAFAR), Head of Forestry
Mihail Kozharev	Lawyer	Same
Venzislav Velichkov	Forester, Head Biological Diversity and Nature Protected Areas	Same
Luben Pumpalov	Engineer, Expert	Same
Meglana Kuneva	Senior Legal Advisor	Council of Ministers
Irina Kostadinova	Important Bird Areas Officer	Bulgarian Society for the Protection of Birds/BirdLife Bulgaria
Boriana Mihova	Coordinator	Wilderness Fund

Maya Konstantinova	Coordinator	Bulgarian-Swiss Biodiversity Conservation Program
Gottlieb Dandliker	BirdLife Switzerland Coordinator	Same
Pierre Galland	Pro-Natura Coordinator	Same
Tenyu Meshinev	Expert Phytocoenology	Same, also GEF Consultant
Iva Apostolova	Botanist	Same, also GEF Consultant
Nikolai Spassov	Zoology	Same, also GEF Consultant
Kiril Georgiev	High Mountain Meadows Project	Same
Stoian Dobrev	MEW Forester, Leader Strandzha Project	Same
Paddy Kavanaugh	Program Director	Phare Program, MoE
Ken Hill	Country Director	Peace Corps
Bouriana Konaklieva	Environment Program Manager	Same
Dafina Gercheva	Sustainable Development Advisor	UNDP
<b>NP RILA – BLAGOEVGRAD</b>		
Mimi Pramatarova	Head	Rila NP Department of MoE Center for Environment and Sustainable Development, Sofia
Evgeni Lazarov	Engineer, Infrastructure	Same
Vasil Petrov	Forester	Same
Blagoi Buchinski	Driver	Same
Maya Damianishka	Director	Regional Youth Center
Kalinka Spassova	Head of Department for Ecology	Same
Julia Ingilizova	Chairman	Children of the Earth NGO
Sashka Dzhadzharova	Member	Same
Ivanka Tosheva	Member	Same
Vesela Lacheva	Member	Same

Kamelia Grancharova	Director	Blagoevgrad History Museum
Ekaterina Andreeva	Research Associate, Head of Department of Nature	Same
Dimitar Dimitrov	Forester, Deputy Director	Regional Direction of Forests
Hristina Popova	Chief Accountant	Same
<b>NP CENTRAL BALKANS – GABROVO</b>		
Nela Rachevitz	Forester, Head	Central Balkans NP Department of MoE Regional Environmental Inspectorate, Veliko Turnovo
Diana Terzieva	Public Relations	Same
Kolyo Varbanov	Expert Infrastructure	Same
Gatyo Gatev	Expert Forests	Same
Anton Stanchev	Expert Flora	Same
Nikolai Rusev	Expert Fauna	Same
Ivan Georgiev	Driver	Same
Stamen Mihailov	Engineer, Director	Regional Environmental Inspectorate, Veliko Turnovo
Zahari Zahariev	Forester, Director	Forestry Enterprise “Rossiza” Stokite
Valerie Marinova	Engineer, Deputy Major of Territorial Urban Management and Development	Municipality of Gabrovo
Stilian Stilianov	Member of the Board	Initiative for Sustainable Development NGO, Gabrovo
Tzocho Bankovski	Forester, Director	NP Central Balkans CoF Management Unit (Forest)
Petar Machkovski	Expert	Same
Petya Kovacheva	Public Relations	Same

**In total, 82 persons interviewed.**

## Appendix C: Review of Progress on Activities Recommended in the Bulgarian National Biological Diversity Conservation Strategy

---

This document is an initial attempt to review actions undertaken in Bulgaria to implement recommendations of the National Biological Diversity Conservation Strategy (NBDCS) for the period 1993-1997. A more careful examination of the NBDCS and its realization is needed. The mid-term Evaluation Team offers these observations as a starting point for a more extensive review.

### GENERAL ASSESSMENT

Despite the high degree of recognition that it has received within and beyond Bulgaria, the NBDCS has not been officially endorsed through any special legal or other state document or procedure. In fact, strategic planning is still something very new for Bulgaria and neither official requirements nor a legally established bureaucratic procedure for such planning efforts exists. Nevertheless, the main Bulgarian institutions responsible for biodiversity conservation (BdC) undertook various actions according to, or closely related to, those envisioned and recommended in the NBDCS. It should be emphasized that circumstances in Bulgaria, especially the lack of stable economic and institutional conditions, provided a far from ideal context for the pursuit of conservation activities.

### MAIN CONSERVATION ACTIVITIES

#### 1. Land and Resource Management

##### *Protected Areas*

Some steps toward the **clarification and better coordination of the administrative and jurisdictional responsibilities for management of the protected areas** (PAs) have been undertaken, under extremely difficult conditions, within the framework of the GEF Biodiversity Project. These steps have not yet yielded significant results, but as of this writing, there appears to be important movement toward resolution of this complex issue.

Some **biologically critical areas were included in the national network of PAs**. The most important of these is Strandzha Mountain, declared as a National Park (NP) in 1996. The Protected Areas Bill, developed by the former Ministry of Environment but not passed by the Parliament, represents a serious attempt to redesign the whole PA system in Bulgaria.

**Administrative units of several major PAs were established**, but due to legislative gaps, the unclear division of responsibilities, and some institutional and personnel problems, most of these administrative units are not yet operating in a satisfactory manner.



There has been **some increase in the scientific information and research programs for the PAs**. As a result of the recent economic difficulties, support for many of the Bulgarian research institutes has essentially collapsed. Almost all research has been performed by NGOs or in the framework of various nature conservation projects. Especially important in this regard are the Important Bird Areas (IBA) monitoring program (initiated in 1994) of the Bulgarian Society for the Protection of Birds/BirdLife Bulgaria (BSPB); the biodiversity literature reviews and inventories of the Rila and Central Balkans NPs under the GEF Project; research projects undertaken through the Bulgarian-Swiss Biodiversity Conservation Programme (BSBCP); and several monitoring projects of the Ministry of Environment and Waters (MEW). An EU PHARE-funded project for developing a National Biomonitoring Programme was begun in 1996.

Serious attempts to **enhance public interest in the PAs** have been organized. Various activities have been undertaken by the NGOs, the MEW, and by several local departments of the Ministry of Education, as well as by all of the donor-supported BdC projects.

To some extent, **information about the existing PA network** has increased and been made available to the public. Many leaflets, brochures, posters, and other public awareness materials have been produced and dispersed by almost all main actors involved in BdC in Bulgaria.

Despite extremely difficult economic conditions, some **funds to strengthen the PA network** have been secured. Most come from external sources. This must be regarded as a temporary situation, not a sustainable solution to the problem. Some government agencies and NGOs are working diligently to develop and strengthen the capacity to finance BdC activities internally when the economic situation in the country becomes more favorable. The GEF Project has, as one of its major tasks, the definition and exploration of alternative financial mechanisms to support BdC and PA management. In addition, the MEW has created a National Ecofund.

Several **partnership programs were started** to improve the management and preservation of some PAs, including some of the NPs.

### ***Nonreserved Lands***

Compared to activities related to the PAs, very little has been done to conserve biological diversity outside protected territories. **Incentive programs to involve individual citizens and private landowners** in conserving important elements of biodiversity are at a very early stage. **Collaboration between agricultural programs and biodiversity conservation programs** exists to some extent in the area of inland fisheries (which are under the jurisdiction of the Ministry of Agriculture, Forestry, and Agrarian Reform). Also at an initial stage is the work on **habitat strategies for the preservation of biodiversity in Europe**, initiated by BirdLife International. Development of the Bulgarian part of this program will be organized by the BSPB in collaboration with the other concerned governmental and non-governmental organizations. This program seeks to develop rules and principles for the arrangement of economic activities in different types of habitats so that they will have minimal negative impact on biodiversity in the most sensitive and valuable habitats.

## *Sustainable Resource Management*

Some **elements of this approach are included in some of the new resource management laws**. Ecology-based management practices are still undervalued and ignored when planning economic activities in the various sectors (agriculture, forestry, fishery). Attempts to introduce into law **obligatory Environmental Impact Assessment (EIA) provisions for forestry maintenance and development plans** have been made.

## *Habitat Restoration*

In this area, the little that has been done is at an initial stage and has been undertaken in a very limited fashion. An **assessment of the possibilities for restoration of wetlands at Belene Island** in the Danube River was done in cooperation with the Japan International Cooperation Agency (JICA). Similar, to some extent, are the goals of the pilot project, Green Danube, initiated by WWF-Germany together with the former Committee of Forests (CoF) and the NGO Green Balkans. Under the national wetland management plan (see below), restoration activities have also been undertaken at Kamchia, Shabla River, and Srebarna.

## *Ex Situ Conservation*

Most activities in this field are of a scientific character, and there has been **some progress in developing ex situ programs** (one of the projects of the BSPB was of this kind).

## **2. Legislative Initiatives and International Agreements**

The highly unstable political conditions in Bulgaria have not been favorable for acting upon the recommendations in the NBDCS concerning legislative aspects of BdC. Some have nevertheless been implemented, while other attempts have been made to implement certain elements of this program. Pilot activities for **providing procedures for increased public participation in policy formation** have been undertaken. **Information on relevant conservation and environmental protection laws and the texts of the international agreements has been increased and made more easily accessible to the public**. Important steps have been taken at different levels to **synchronize Bulgarian legislation with that of the EU countries**.

## **3. Conservation Administration and Policy**

Some administrative recommendations from the NBDCS have been followed, at least partly. Important steps were taken toward increasing the effective conservation administration of the PAs. In March 1994, the **National Nature Protection Service was established** within the former Ministry of Environment (now MEW). The strengthening of this institution has been a major focus of the GEF Project.

For the first time in Bulgaria, **management plans were developed**—by both the MEW and by NGOs (BSPB)—and implementation was initiated. These plans have involved smaller PAs or parts of the larger ones. Local experience was used, and local experts trained and educated. A

Black Sea **coastal zone management program** was completed in 1993 and implementation has begun. A **national strategy for wetland conservation and management** was also completed in 1993.

**Species conservation action plans have been developed and implementation has begun**, mainly for Globally Threatened Birds (by the BSPB), but also for some mammals (by the Wilderness Fund and Green Balkans). The GEF Project is in direct line with the recommendations to **strengthen the ability of agencies to enforce biodiversity legislation** and to **develop a highly professional work force of land and resource managers**. The previously mentioned **National Ecofund** has strong potential to support biodiversity projects.

With regard to the policy recommendations, none of them has moved forward to any significant degree.

#### **4. Research and Technical Support**

To some extent, the present GEF Project, the projects of the BSBCP, and other donor projects have **encouraged and supported collaborative interdisciplinary studies of biological diversity and its conservation** within and between the state agencies, universities, research institutes, and NGOs. With the collapse of the main state research institutes, some NGOs have continued to undertake **research on rare and threatened species**; to gather **data for updating of the Red Data Books**; to **evaluate natural areas** for inclusion in the network of protected areas; and even to undertake **long-term research projects with special attention to the changing distribution and populations of species** (the National Breeding Bird Atlas project of the BSPB).

#### **5. Environmental Education**

Some steps have been taken to **involve the Ministry of Education in environmental education**. **Educational initiatives have been undertaken** by the MEW, and under the present GEF project and other BdC projects. Various NGOs also work toward this, but as yet no great progress has been made in the development of a real national environmental education strategy. Various state organizations and NGOs have organized **public education programs and information campaigns** as well as more specific **biodiversity education projects**. For example, summer camps to improve conditions at some PAs, to plant trees, and to promote other conservation activities have been organized by different NGOs—the BSPB, Green Balkans, Union for the Protection of the Rhodope Mountains, and others. The MEW, the Ministry of Education, and some NGOs have also developed **BdC education programs and materials**.

#### **6. Ecotourism**

Within the framework of several projects (including the present GEF Project), **both government agencies and NGOs have developed important elements of a possible national policy on ecotourism**. However, a national policy on ecotourism in Bulgaria has not been prepared. A **good assessment of existing environmental and cultural resources and their ecotourism**

**potential** has been prepared. More particularly, **key sensitive areas for birds have been identified** and some measures have been taken to direct bird-watching activities in such a way that they can be very effective as tourism destinations, but with minimum risk for the birds and for natural features in general (this information is now published in the BSPB's book *Where to Watch Birds in Bulgaria*). Most of the **private tour operators have established links to other key parties**, such as NGOs (BSPB, for example, has established strong cooperative relationships with the main nature tour operators in Bulgaria).

## **7. Collaborative Partnerships**

The last few years have seen **extremely important steps toward developing collaborative partnerships** for BdC in Bulgaria. It has been extremely challenging to work under the existing conditions during this period of transition. During this time, many organizations and institutions have shown serious interest in the conservation of Bulgaria's biodiversity, and many international projects and activities of great value for the main actors within the country have been initiated. Many new NGOs, with diverse goals, have been established, although only a few of these have been able to establish themselves as major players affecting BdC actions and policies in the country. But an even more important achievement has been the **increasing ability of these NGOs to work together and to work with the government agencies**. It is possible to say that, to a great degree, the **principles of partnership have been adopted by the main state and civil bodies involved in biodiversity conservation**, as has appreciation of the necessity and opportunity of **working with the local people** at different levels.

## **PROBLEMS AND DEFICIENCIES**

One important problem in implementing the recommendations of the NBDCS has been the lack of an overall action plan for biodiversity conservation. For the most part, the activities described above have been organized and undertaken in isolation from one another, not as parts of one coordinated national scheme. As a consequence, the real results have been less substantial than they might have been. The development of such an action plan remains an important need.

The activities described here have not all been pursued in direct correspondence with the NBDCS. There is no official scheme to allow us to monitor implementation of the strategy recommendations, and no mechanism exists for the regular exchange of information on these matters. This review should be considered an initial, but incomplete, attempt to define progress in meeting the goals of the national strategy. It is quite probable that other activities have been undertaken and are not mentioned in this document.

*Prepared by Petar Iankov and Curt Meine, 10 July 1997*

## **Appendix D: The Evaluation Team**

---

A three-person team conducted the evaluation. Team Leader Roy Hagen is a forester by training with 27 years of professional experience, 21 of which are in international development and conservation programs in natural resources management and conservation. Most of Mr. Hagen's work in the past seven years has been on a wide range of biodiversity conservation initiatives. He has worked on Global Environmental Facility biodiversity projects and enabling activities for both the World Bank and UNDP in six different countries. He has also worked on eight different project/program evaluations, most of them as team leader and most of them involving biodiversity conservation. Mr. Hagen is an independent consultant; this was his first experience in Eastern Europe.

Curt Meine is a conservation biologist, a natural resources historian, and the Coordinator of the IUCN Action Plan for the International Crane Foundation in Baraboo, Wisconsin. He is a widely published author and speaker in his field. Mr. Meine has made two previous visits to Bulgaria in 1993 for the USAID-funded Biodiversity Support Program to assist in the development of the National Biodiversity Conservation Strategy. Mr. Meine was the principal editor of the NBDCS.

The third team member, Petar Iankov, is the head of the Bulgarian Society for the Protection of Birds, one of Bulgaria's most capable environmental NGOs. Mr. Iankov was also an active participant in the preparation of the NBDCS. He has a Ph.D. in ornithology and is active internationally in his field.

## Appendix E: The Evaluation Methodology

---

Most of the evaluation took place over a four-week period from June 16 to July 21. It began with two days of briefings and meetings at ARD's headquarters in Burlington with team members Hagen and Meine, USAID Contracting Officer's Representative (COTR) Linda Lind, and ARD Home Office Project Manager Peter Hetz. The project history and the evaluation SOW were reviewed in detail. Hagen and Meine then traveled to Sofia where they joined the third team member Petar Iankov.

The full team undertook the following team-building activities together:

- Each team member summarized their experience and background as they relate to the present evaluation, in particular their past experience with, and philosophies on, evaluations. Each presented what they considered to be the particular strengths they brought to the team.
- The team went over the evaluation SOW of work together, sharing their perspectives on which issues were of the highest priorities for this evaluation. Given the long and detailed SOW and the tight schedule, the Team continually sought to identify and focus on priority issues.
- Hagen and Meine summarized the results of the two days in Burlington.
- The team went through all the documents they had obtained and reached a consensus on which were the most critical documents that all team members needed to be familiar with.
- The team had its first discussion about what should be the most important interviews and meetings to conduct and strategized on how to conduct them.
- It was agreed that the Team Leader would draft a table of contents for the evaluation report within the first week and that team member responsibilities for drafting sections of the report would be made from the table of contents as early as possible.

It was agreed that the most critical documents for the evaluation were the following:

- the most important document is the project SOW from the USAID/ARD contract—this is the basic design document against which project implementation is evaluated;
- the intergovernmental MOU signed on January 1995 between the GOB and the U.S. government. This document defines the commitments made by each government; and
- the SOW for the evaluation.

The team agreed to make a concerted effort to brainstorm together before key meetings on how to conduct each interview and on what were the key topics/questions/issues to be covered. Furthermore, the team sought to meet at least once a day, as possible, to compare and discuss their main impressions of the meetings held during the day. The team was quite successful in doing this. The full list of contacts/meetings/interviews is presented in Appendix B. Over 80 people were interviewed. The PMU handled most of the scheduling of these meetings and provided professional translators whenever needed.

The Team conducted numerous interviews in Sofia through June 23. Key meetings during this period included meetings with the head of the existing NNPS (the reader must bear in mind throughout this report that the existing NNPS is not the NNPS that was envisaged in the design of this project). The authors have sought throughout this report to distinguish clearly between the two, the new head of Forestry (former Committee of Forests or CoF), and the PMU professional staff. The Team then made their first field visit to Rila National Park on June 26 and 27. Team member Iankov left the team for a previously scheduled engagement in Czechoslovakia (from June 27 to 30). Meine and Hagen accepted an invitation for a Bulgarian-Swiss Biodiversity Project sponsored outing to the mountain meadows of Central Balkans National Park on June 28 and 29 and met many of those involved with administering and implementing that project, the second largest donor activity in the biodiversity sector.

After one additional day of meetings in Sofia, the full team visited Central Balkans National Park on July 1 and 2. Both park visits concentrated on the MEW park-level bodies, but also included visits with all major types of Forestry institutions working in or near the parks as well as NGOs, municipalities, and a museum. All field visits and most interviews were completed by July 4. The team spent all of July 5 together reviewing and debating their key findings and recommendations using the draft table of contents as a base for discussion.

The USAID COTR arrived July 7 and stayed until after all the Team had left. The Team presented their preliminary findings and recommendations to the new Minister of MEW on July 8 (This was the first formal meeting with a high-level Ministry official that the project had been able to hold since the interim “caretaker” government was formed in February of this year.) On Wednesday, the Team made a similar presentation to the second annual project work planning workshop that was being held. The presentation was immediately followed by open discussion. None of the participants disagreed with any of the key findings or recommendations made. Most participants were in general agreement with the Team. Another full-team briefing was made on July 11 to the OAR Representative, the OAR Program Officer, and the COTR. This resulted in a request from the OAR Representative that Team Leader Hagen stay an additional week to work on specific options and recommendations for USAID to use in negotiations with MEW on the project’s future.

Meine left July 13 leaving drafts on design issues and the evaluation of pilot management planning and development of financial mechanisms. Hagen remained in Sofia the week of July 14 preparing and refining subsequent drafts of the options and recommendations, working with Petar Iankov on his sections of the report and attending several follow-up meetings. On July 16, Hagen again presented key findings and recommendations at a meeting with the Minister of

MEW, OAR, the COTR, and ARD's SRA. Hagen returned to his home on July 19 and completed a full draft report during the following week. He remained in daily contact with the Project by e-mail and shared key drafts with team member Meine by E-mail.

The draft was reviewed and commented on by the COTR, the PMU professional staff, and the other evaluation team members. Hagen amended the draft in response to these comments in early September.